

Deposition Transcript

Case Number: 2:23-cv-08968-FMO

Date: January 29, 2026

In the matter of:

GUNDAM TOURING SERVICES US LLC v KATARINA BENZOVA

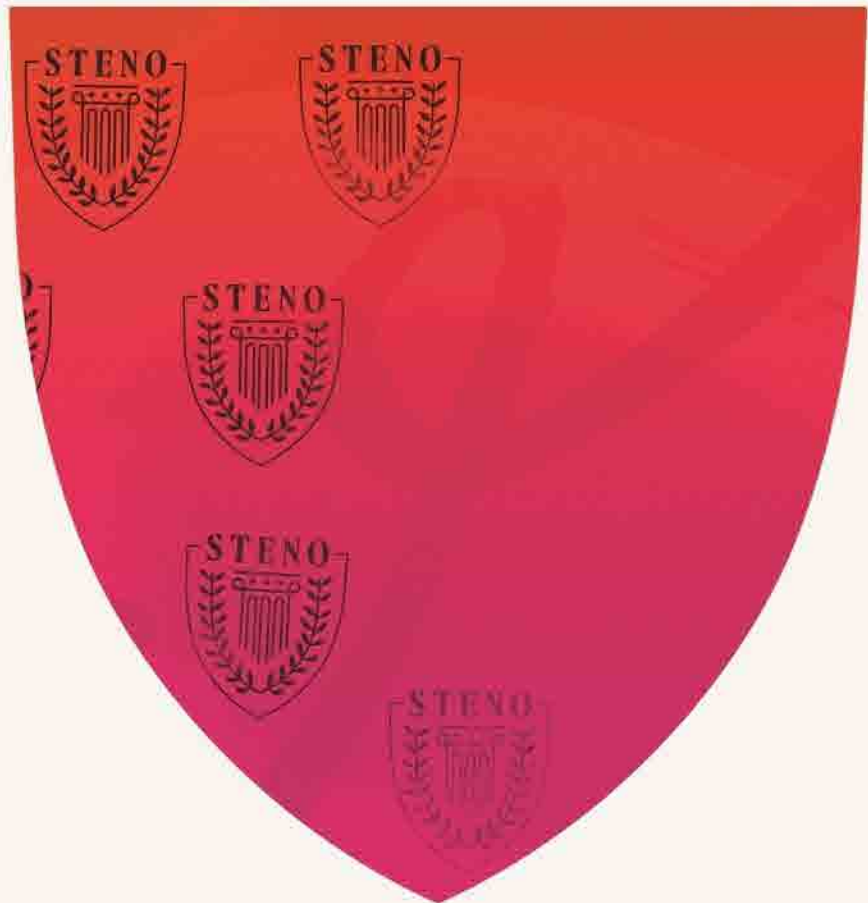
W. AXL ROSE

**CERTIFIED
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GUNDAM TOURING SERVICES US LLC;)
GUNDAM PRODUCTIONS, LLC; AND)
WATERHEAD INTERNATIONAL, INC.,)
Plaintiff,) Case No.:
2:23-cv-08968-FMO (Ex)
vs.)
KATARINA BENZOVA,)
Defendant)

Video-Recorded Deposition of
W. AXL ROSE

Thursday, January 29, 2026

925 N. La Brea Avenue, 5th Floor

Los Angeles, California

10:34 a.m. - 7:38 p.m.

Reported by: Lisa Atlas, California CSR No. 13330

APPETITE FOR DISCUSSION

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16	zachrosenblatt@gmail.com	16	
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Page 6 1 THURSDAY, JANUARY 29, 2026, LOS ANGELES, CALIFORNIA 2 10:34 a.m. 3 -oOo- 4 5 THE VIDEOGRAPHER: Good morning. We're on the 6 record. The time is 10:34 a.m. Pacific time. Today's 7 date is January 29th, 2026. And here begins the 8 deposition of Axl Rose in the matter of Gundam Touring 9 Services US LLC, et al., vs. Katarina Benzova. This 10 case is being heard at United States District Court, 11 Central District of California. The deposition is 12 taking place at 925 North La Brea Avenue. We're on the 13 5th floor, Los Angeles, California 90038. My name is 14 Kevin Johnson. I'm a legal videographer on behalf of 15 Steno. 16 Would counsel please identify yourself and 17 state who you represent, beginning with the questioning 18 attorney. 19 MR. ROSENBLATT: Zach Rosenblatt representing 20 Katarina Benzova. 21 MR. GUTMAN: Good morning. Alan Gutman on behalf 22 of the plaintiffs and counter-defendants. 23 MR. DEIXLER: Bert Deixler of Kendall Brill & 24 Kelly. Personal counsel to the witness. 25 THE VIDEOGRAPHER: Our court reporter, she is now	Page 7 1 going to introduce herself and swear in the witness. 2 THE REPORTER: Lisa Atlas, CSR number 13330. 3 4 W. AXL ROSE, 5 having been first duly placed under oath, 6 was examined and testified as follows: 7 8 MR. ROSENBLATT: First, I'd like to establish the 9 following rules on the record to ensure this deposition 10 proceeds efficiently, in compliance with the federal 11 rules. 12 First, all objections to taking this 13 deposition have been waived. The court's order at 14 Docket 188 explicitly states that all potential 15 objections to taking these depositions were waived by 16 the deponent's failures to seek or obtain a protective 17 order. No protective order was sought, and now 18 Mr. Rose's obligation to appear and answer questions has 19 arrived. 20 MR. GUTMAN: Excuse me. We're here -- 21 MR. ROSENBLATT: Hold on. 22 MR. GUTMAN: We understand -- 23 MR. ROSENBLATT: Second -- 24 MR. GUTMAN: Pardon me, don't interrupt me while 25 I'm speaking. I'll show you the same courtesy.
Page 8 1 Nothing that he's saying has any impact on the 2 conduct of the proceedings here today. So we have the 3 right to interpose objections to specific questions. 4 MR. ROSENBLATT: Thank you. 5 MR. GUTMAN: Go ahead, Counsel. 6 MR. ROSENBLATT: Thank you. 7 Second, this deposition is limited to seven 8 hours of on-the-record time, exclusive of breaks, 9 Federal Rule of Civil Procedure 30(d)(1). We're also 10 going to rely on Condit v. Dunne for this, 225 F.R.D. 11 100, S.D.N.Y. 2024. We intend to use all seven hours, 12 and we will account for time on the record. Counsel who 13 unreasonably prolongs questioning through obstructionist 14 tactics will not be granted additional time, and we'll 15 rely on Roberson v. Bair for that. 16 Third, improper objections and speaking 17 objections are prohibited. All objections must be 18 stated concisely in a non-argumentative and 19 non-suggestive manner, Federal Rule of Civil Procedure 20 30(c)2. So the following conduct is improper and will 21 be noted on the record as obstructionist: Speaking 22 objections that coach the witness or suggest answers; 23 objections that characterize testimony, answer for the 24 witness, or misstate the record; lengthy explanations 25 beyond stating the legal ground; instructions not to	Page 9 1 answer except to preserve privilege, enforce a prior 2 court order, or present a motion to terminate. And 3 we'll rely on Loop AI Labs Inc. v. Gatti, 2016 U.S. 4 District LEXIS 114247 for that. 5 Fourth, the attorney-client privilege protects 6 communications, not facts. The attorney-client 7 privilege only protects disclosure of communications; it 8 does not protect disclosure of the underlying facts by 9 those who communicated with the attorney. 10 Fifth, our goal is to obtain truthful, direct 11 answers. 12 We're not here to harass you, Mr. Rose. We 13 appreciate your presence and appreciate you abiding by 14 the court order. 15 This examination will proceed in good faith; 16 however, if opposing counsel believes the question 17 becomes improper, the remedy is to contact the 18 magistrate judge by telephone, not to unilaterally 19 obstruct or terminate the deposition. 20 Okay. So let the record reflect these 21 preliminary matters. I think it goes without saying, 22 threats of sanctions may not be used to gain advantage 23 in the deposition. And we'll rely on California Rules 24 of Conduct Rule 3.2 for that. 25 ///

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Page 10 1 EXAMINATION 2 BY MR. ROSENBLATT: 3 Q. So, let's do some preliminary questions. 4 Mr. Rose, please state your full legal name 5 for the record. 6 A. W. Axl Rose. 7 Q. Have you ever been known by any other names? 8 A. Yes. 9 Q. Which name? 10 A. William Bruce Bailey. 11 Q. Have you ever had your deposition taken 12 before? 13 A. Yes. 14 Q. Do you understand you are under oath today? 15 A. Yes. 16 Q. Do you understand that the means you are sworn 17 to tell the truth, the same as if you are in a courtroom 18 with a judge and a jury? 19 A. Yes. 20 Q. Are you prepared to answer my questions today? 21 A. Yes. 22 Q. There's nothing that will prevent you from 23 giving me your full attention? No medications, no 24 illness, or anything else? 25 A. No.	Page 11 1 Q. You aren't taking any medications or suffering 2 from any illness that will prevent you from 3 understanding my questions or answering them fully? 4 A. No. 5 Q. If you don't understand one of my questions, 6 will you tell me? 7 A. Yes. 8 Q. If you need to take a break at any time, tell 9 me, and we'll take a break. 10 Is that okay? 11 A. Yes. 12 Q. You understand the court reporter will 13 transcribe everything we say here today? 14 A. Yes. 15 Q. We have up to seven hours on record, exclusive 16 of breaks. 17 Do you understand? 18 A. Yes. 19 Q. Mr. Rose, are you the principal and manager of 20 Gundam Touring Services, LLC? 21 MR. GUTMAN: Objection. Compound. 22 You can answer. 23 MR. ROSENBLATT: Are you instructing him not to 24 answer? 25 MR. GUTMAN: Did you hear me instruct him?
Page 12 1 BY MR. ROSENBLATT: 2 Q. Are you the principal and manager of Gundam 3 Touring Services, LLC? 4 MR. GUTMAN: Same objection. Compound. 5 THE WITNESS: I believe so. 6 BY MR. ROSENBLATT: 7 Q. Please answer the -- 8 A. I believe so. 9 Q. You believe so. You don't know if you are the 10 principal of Gundam Touring Services, LLC? 11 A. I believe so. 12 Q. You believe so. 13 MR. GUTMAN: You've answered the question. 14 THE WITNESS: Okay. 15 BY MR. ROSENBLATT: 16 Q. Are you the principal of Gundam Productions, 17 LLC? 18 A. I believe so. 19 Q. You believe so. 20 Are you the director of Waterhead 21 International, Incorporation? 22 A. I believe so. 23 Q. Are you the manager of Gundam Marketing, LLC? 24 A. I believe so. 25 Q. Why do you just "believe"?	Page 13 1 MR. GUTMAN: Objection. Argumentative. 2 THE WITNESS: Because with legal things, there 3 could be a different term for it that I'm not aware of 4 at this time. 5 BY MR. ROSENBLATT: 6 Q. Do you own the company? 7 A. As far as I know. 8 Q. Are you the chief executive officer of Black 9 Frog Touring, Inc.? 10 A. Possibly. 11 Q. "Possibly." 12 MR. DEIXLER: Counsel, you've repeated the 13 witness's answer. It both consumes time and seems 14 harassing. I would appreciate if you could restrain 15 yourself from so doing. 16 BY MR. ROSENBLATT: 17 Q. Are you the chief financial officer of Black 18 Frog Music? 19 A. I don't know. 20 Q. You don't know. 21 Are you the holder of Guns N' Roses trademark? 22 A. I believe so. 23 Q. Do all the entities, Gundam, Waterhead, Black 24 Frog, Gundam Touring, do they share the same principal 25 place of business at 5950 Canoga Avenue, Suite 510,

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Page 14 1 Woodland Hills, California 91367? 2 A. Can I ask a question? Is that my 3 accountant's? 4 MR. DEIXLER: Just answer if you know. Just if you 5 know the answer, that's fine. 6 THE WITNESS: I don't know. 7 BY MR. ROSENBLATT: 8 Q. You don't know. So you're not familiar with 9 the address 5950 Canoga Avenue, Suite 510, Woodland 10 Hills, California? 11 A. No. 12 Q. You're not familiar? 13 MR. GUTMAN: The question's been asked and 14 answered. 15 MR. ROSENBLATT: Are you instructing him not to 16 answer? 17 Q. You're under oath. 18 A. Absolutely. 19 Q. So your testimony is under oath. 20 So are you complete -- does the address 5950 21 Canoga Avenue, Suite 510, Woodland Hills, 91367, do you 22 have any business at that address? 23 A. Possibly. 24 Q. "Possibly." 25 MR. DEIXLER: Counsel, you're persistently	Page 15 1 repeating the witness's answer. It feels, to me, 2 intimidating. I would appreciate if you would not do 3 that. It's unprofessional and unnecessary. 4 BY MR. ROSENBLATT: 5 Q. What is Team Brazil Management Corporation? 6 MR. GUTMAN: Objection. Vague. 7 If you know. 8 MR. ROSENBLATT: Are you instructing him not to 9 answer? Objection noted. Are you instructing him not 10 to answer? 11 MR. GUTMAN: If I am instructing him, you'll hear 12 me instruct him. You don't have to ask me every time I 13 object whether I'm instructing him. 14 THE WITNESS: Could you repeat the question, 15 please. 16 BY MR. ROSENBLATT: 17 Q. What is Team Brazil Management Corporation? 18 A. Our management company. 19 Q. Is Fernando Lebeis the manager of Guns N' 20 Roses? 21 A. Yes. 22 Q. When did you hire Fernando Lebeis to become 23 the manager of Guns N' Roses? 24 A. I don't know. 25 Q. You don't know?
Page 16 1 A. Maybe 2012. 2 MR. ROSENBLATT: Okay. 3 MR. DEIXLER: Counsel, it would be better if you 4 didn't comment on the witness's testimony. It would be 5 more professional. 6 THE WITNESS: 2011, 2012. Something like that. 7 MR. ROSENBLATT: I'd like to introduce for the 8 record Exhibit 1, Secretary of State records of Black 9 Frog Entities. One moment. Sorry, this -- apologies -- 10 is Exhibit 3 for the record. 11 (Defendant's Exhibit 3 was marked.) 12 MR. DEIXLER: I'm sorry, when you say "this," what 13 you have heretofore identified as Exhibit 1 is 14 Exhibit 3? 15 MR. ROSENBLATT: Yes. 16 MR. DEIXLER: Okay. 17 (Distributing copies of exhibit.) 18 BY MR. ROSENBLATT: 19 Q. Can you read who the officer's name that is on 20 that Secretary of State record, please. 21 A. Officer, okay, yeah, W. Axl Rose. 22 Q. Will you read the entity name. 23 A. Entity. Where does it say "entity"? 24 Q. If you look in the first column to the right. 25 A. Okay. So, Black Frog Music.	Page 17 1 Q. And will you read three columns down right 2 here. Will you read that section. 3 A. The address? 4 Q. Yes. 5 A. 5950 Canoga Avenue, Suite 510, Woodland Hills, 6 California 91367. 7 Q. So do you have any business at that address? 8 A. Well, looking at this, it looks like it's my 9 accountant's, which is what I asked earlier. So yeah. 10 MR. ROSENBLATT: Yeah. 11 MR. DEIXLER: It would be better if you didn't 12 repeat the witness's answer. It's unprofessional, 13 unnecessary, and it just feels intimidating, Counsel. 14 THE WITNESS: I really don't mail myself. So I 15 don't really know my accountant's address. 16 BY MR. ROSENBLATT: 17 Q. How did you vet Fernando as the manager of 18 Guns N' Roses? 19 A. Well, I've known him since he was 11. I've 20 known him and been involved with him as part of my 21 family since he was 11. 22 Q. So you trust him? 23 A. Yes. 24 Q. He's your friend? 25 A. Yes.

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Page 18 1 Q. Does he have experience in copyright? 2 MR. GUTMAN: Objection. Vague. 3 BY MR. ROSENBLATT: 4 Q. Before you hired him? 5 Objection noted. 6 A. In what sense? 7 Q. Did he have any previous experience as a 8 manager before you hired him as the manager of Guns N' 9 Roses? 10 A. Not as the in-charge manager, but he worked 11 for -- as an assistant manager to Irving Azoff, Doc 12 McGhee, Peter Katsis. There was a three-manager team in 13 there that I don't remember any of their names. He 14 worked with Doug Goldstein, our previous manager, and he 15 worked for Merck Mercuriadis as assistant manager. And 16 he worked at Sanctuary with Merck Mercuriadis. 17 Q. Okay, so when you say you worked with Doug 18 Goldstein, what do you mean? 19 A. Me or he? Did you -- 20 Q. Fernando. What do you mean by saying he, 21 Fernando, worked with Doug Goldstein? 22 A. He worked in dealing with anything with Guns 23 N' Roses that Doug wanted him to do or we wanted him to 24 do. 25 Q. What authority does he have as manager of Guns	Page 19 1 N' Roses? 2 MR. GUTMAN: I'm sorry, I couldn't hear the 3 question. Can you... 4 MR. ROSENBLATT: No problem. 5 THE WITNESS: He has authority as the manager of 6 Guns N' Roses. 7 BY MR. ROSENBLATT: 8 Q. What are all the responsibilities and powers 9 that that entails? 10 A. That's a pretty long list. So what are you 11 asking? 12 Q. Does he have the power to hire and fire? 13 A. Yes. In a lot of situations, yes, and -- but 14 with the caveat of my approval at times. You know, 15 other times, it's not necessary. 16 MR. ROSENBLATT: Okay. Okay. 17 MR. DEIXLER: We'll assume all his answer are okay. 18 You needn't repeat that. It seems very harassing and 19 intimidating, Counsel. If you'd cease and desist from 20 that, I think it'd be more professional and better for 21 everybody. 22 MR. ROSENBLATT: I apologize. 23 Q. So, we're on the record saying that Fernando 24 Lebeis has extensive experience with copyrights, and 25 prior to being hired?
Page 20 1 MR. GUTMAN: Objection. Misstates, 2 mischaracterizes -- 3 THE WITNESS: I did not say that. 4 MR. GUTMAN: -- prior testimony. 5 THE WITNESS: I did not say that. 6 MR. ROSENBLATT: Okay. 7 MR. DEIXLER: We're going to assume every answer is 8 okay, Counsel, without your repeating that. So please 9 don't do that anymore. Would you try to do that? 10 THE WITNESS: I -- 11 MR. GUTMAN: No question pending. Let him ask a 12 proper question. 13 BY MR. ROSENBLATT: 14 Q. So how did you vet Fernando as manager of Guns 15 N' Roses? 16 MR. GUTMAN: I thought that was asked and answered. 17 THE WITNESS: He's been part of my home and family 18 since '91. He's worked every level of Guns N' Roses, 19 from being a gopher to wardrobe to tour manager. You 20 know, just from the bottom up. And he's worked inside 21 the record label of Sanctuary, and he's worked as the 22 go-to guy for every manager we had before him until it 23 was realized that he was really the guy that should be 24 doing the job. 25 ///	Page 21 1 BY MR. ROSENBLATT: 2 Q. Did Irving Azoff sue you? 3 A. Yes, and I sued him too. 4 Q. What happened in that lawsuit? 5 A. I don't remember. I don't recall. 6 Q. You don't recall. 7 MR. DEIXLER: He's already told you that. If you 8 repeat his answer, it both consumes time and it seems 9 very intimidating. Please cease and desist. I think 10 I've asked that before. 11 BY MR. ROSENBLATT: 12 Q. Do you own gunsntoroses.com? 13 A. I believe so. I say this "I believe so" stuff 14 because -- 15 MR. GUTMAN: You don't have to explain. No 16 explanation. 17 MR. ROSENBLATT: Please, yeah. 18 MR. GUTMAN: It's okay. Ask a proper question. 19 MR. ROSENBLATT: Don't coach. Please don't coach 20 the witness. 21 MR. GUTMAN: Excuse me, just ask your question. 22 BY MR. ROSENBLATT: 23 Q. Do you sell any merchandise on gunsntoroses.com? 24 A. Maybe. 25 Q. "Maybe."

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Page 22 1 Sorry guys, it's a habit. I'm not doing it 2 intentionally. I apologize. 3 MR. DEIXLER: It feels intentional, and it's just 4 so intimidating. I really wish you would stop it. 5 BY MR. ROSENBLATT: 6 Q. Are you aware that all of the photographs at 7 issue in this case you don't own? 8 A. Absolutely not. 9 Q. Do you own the photographs at issue in this 10 case? 11 A. That is my understanding. 12 Q. You have not been informed that you don't own 13 the photographs? 14 A. Absolutely not. 15 Q. How do you own the photographs? 16 MR. GUTMAN: Could I have the question back? I 17 couldn't hear. 18 (Last question read.) 19 MR. GUTMAN: Objection. Vague. Assumes a fact. 20 BY MR. ROSENBLATT: 21 Q. How did you acquire the copyrights in the 22 photographs at issue in this case? 23 MR. GUTMAN: Objection. Foundation. 24 THE WITNESS: I believe through a contract with Kat 25 Benzova.	Page 23 1 BY MR. ROSENBLATT: 2 Q. What kind of contract? 3 MR. GUTMAN: I'm sorry, I couldn't hear the 4 question. 5 (Last question read.) 6 MR. GUTMAN: Objection. Vague. 7 THE WITNESS: A contract hiring her services as a 8 photographer. 9 BY MR. ROSENBLATT: 10 Q. Did you know Kat was born in a foreign 11 country? 12 A. As far as I know. 13 Q. What's Black Frog Entities? 14 MR. GUTMAN: Objection. Vague. 15 THE WITNESS: One of the companies that I have 16 dealing with Guns N' Roses and different music and 17 copyrights, things like that. 18 BY MR. ROSENBLATT: 19 Q. Does Black Frog Entities deal with 20 photographic copyrights? 21 A. I don't know. 22 Q. Have they ever claimed to own any of the 23 photographs at issue in this case? 24 A. I don't know which company would actually own 25 the photographs, of mine.
Page 24 1 Q. So it could be any of them? 2 A. Yes. 3 Q. But they definitely claimed ownership of the 4 photographs in this case? 5 A. Absolutely. 6 Q. "Absolutely." 7 MR. DEIXLER: He said "absolutely." You needn't 8 repeat it, Counsel. You're not trying to intimidate 9 him, are you? 10 MR. ROSENBLATT: Absolutely not. We're here in 11 good faith, and this is a calm deposition. 12 Q. How do you compensate Fernando as the manager 13 of Guns N' Roses? 14 A. He's paid through the accountant here on this 15 form that you gave me. 16 Q. Is he paid a salary? 17 A. I don't know. 18 Q. You don't know how Fernando is compensated? 19 A. Exactly. 20 Q. Okay. Who owns the catalog to Guns N' Roses? 21 MR. GUTMAN: Can I have the question back? I 22 couldn't hear. 23 BY MR. ROSENBLATT: 24 Q. Who owns the catalog to Guns N' Roses? 25 MR. GUTMAN: Manifestly irrelevant. Not reasonably	Page 25 1 calculated to lead to the discovery of admissible 2 evidence. No foundation. Harassing. 3 MR. ROSENBLATT: It's an improper objection. Are 4 you instructing him not to answer? 5 THE WITNESS: Am I answering? 6 MR. GUTMAN: I don't understand what he just said. 7 BY MR. ROSENBLATT: 8 Q. Who owns the catalog to Guns N' Roses? 9 A. As far as I am aware, that would be either 10 myself, Slash, and Duff; or myself, Slash, and Duff and 11 Geffen Records. Or maybe just Geffen Records owning the 12 catalog. I know I own my publishing. Each individual 13 does. 14 Q. Did you ever do an endorsement for HYT watch 15 company? 16 A. Yes. 17 Q. Did you give them a photo for that 18 endorsement? 19 A. Yes. 20 Q. Did you approve of that photo personally? 21 A. I don't recall. 22 Q. If you didn't approve -- 23 You don't recall because you never did it, or 24 you don't recall because it never happened? 25 A. Doesn't that mean the same thing, what you

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Page 26 1 just said? 2 MR. GUTMAN: Sounds, to me, the same. 3 BY MR. ROSENBLATT: 4 Q. Sorry, I apologize. I misspoke. 5 You don't recall because you don't remember, 6 or you don't recall because it never happened? 7 MR. GUTMAN: Objection. Vague. 8 THE WITNESS: Because what never happened? Sorry, 9 sir. 10 MR. ROSENBLATT: The approval of the photo. 11 THE WITNESS: I don't recall. I know which photo 12 exactly you're talking about. 13 BY MR. ROSENBLATT: 14 Q. Did Kat take that photo? 15 A. Yes. 16 Q. Do you believe you own that photo? 17 A. Yes. 18 Q. You still believe you own that photo? 19 A. Yes. 20 Q. Do you have a written contract that says you 21 own that photo? 22 A. I believe so. 23 Q. Where is it? It wasn't shown in discovery. 24 So we'd like to see that. 25 A. I wouldn't know if it was or wasn't.	Page 27 1 Q. You don't know? 2 A. Well, I have not -- I do not know what you've 3 seen or not seen. It's my understanding that there's a 4 contract that says I own the photos. 5 Q. Do you have an explicit contract from Kat that 6 says you're allowed -- that you own that photograph? 7 A. I believe so. 8 Q. Do you have a contract with Kat, a written 9 contract, that says she gave you permission to use that 10 photo in the HYT watch endorsement? 11 A. I don't know that she has a right to ask me if 12 I give her permission for anything that I own. 13 Q. Are you aware that the court found that 14 there's no valid work-for-hire agreements in this case? 15 MR. GUTMAN: Objection. Foundation. 16 Argumentative. 17 THE WITNESS: No. 18 BY MR. ROSENBLATT: 19 Q. Is Nightrain part of gunsroses.com? 20 A. Nightrain is a song of ours, and it's a form 21 of alcohol that you can buy in the grocery store, liquor 22 store. 23 Q. Is it also the name of a subscription service 24 accessible through gunsroses.com? 25 A. I believe so.
Page 28 1 Q. Do you own that subscription service? 2 A. I believe so. 3 Q. Are there pictures posted? 4 A. I wouldn't know. 5 Q. You've never seen the subscription service? 6 A. I don't recall. I don't look at Guns N' Roses 7 stuff on the Internet. 8 Q. You've never approved anything that's gone on 9 that website? 10 A. I wouldn't know. 11 Q. You wouldn't know if you've approved? 12 A. Well, there may be things I approved that are 13 used on the website that I wouldn't know if they're used 14 there or not. And there may be things that I didn't 15 approve. I don't know. 16 Q. Are you the boss of Guns N' Roses? 17 MR. GUTMAN: Objection. Argumentative. Harassing. 18 Foundation. Vague. 19 THE WITNESS: It depends how you look at it. 20 BY MR. ROSENBLATT: 21 Q. The leader, the guiding spirit? 22 A. Still depends how you look at it. 23 Q. Do you believe so? 24 A. I work with the people that I work with, and 25 we do not -- we don't get into, between each other,	Page 29 1 who's in charge or whatever. We just work out whatever 2 it is we're trying to do, between each other. 3 Q. How long have you been the lead singer of Guns 4 N' Roses? 5 A. Since 1985. 6 Q. Do you own the name Guns N' Roses? 7 A. Yes. 8 Q. How did you acquire that? 9 MR. GUTMAN: Objection. Manifestly irrelevant. 10 Not reasonably calculated to lead to the discovery of 11 admissible evidence. And also may call for 12 attorney-client privileged communication. 13 If it does, if your understanding is based 14 upon a privileged communication, I would ask that you 15 not disclose it. 16 THE WITNESS: I don't know that it's privileged. 17 That was what we came up with between the five members 18 of the Appetite For Destruction lineup, between 19 ourselves, that I own the name because I came up with 20 the name. 21 BY MR. ROSENBLATT: 22 Q. Do you have a formal contract that says that? 23 A. Yes. 24 MR. GUTMAN: Object- -- excuse me. Objection. 25 Manifestly irrelevant. Not reasonably calculated to

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Page 30 1 lead to the discovery of admissible evidence. 2 MR. ROSENBLATT: Objection noted. 3 MR. GUTMAN: Also, if any information in response 4 to this type of question is based upon any 5 communications you had with counsel -- 6 MR. ROSENBLATT: Please don't coach the witness. 7 MR. GUTMAN: Pardon me. If any -- if your ability 8 to answer these types of questions is based upon 9 communications that you had -- 10 MR. ROSENBLATT: Alan, I believe you're coaching 11 the witness. 12 MR. GUTMAN: Excuse me, I told you at the 13 beginning, do not interrupt me, and I'll show you the 14 same courtesy. Now, start acting professionally. 15 So you're clear, if there's information that's 16 based upon a privileged communication that you had with 17 an attorney, in order to maintain that privilege, you 18 don't have to respond, or you shouldn't respond, to a 19 question. But based on your own knowledge, you can 20 answer these questions. 21 THE WITNESS: Could I hear the question again, sir. 22 MR. ROSENBLATT: Court reporter, will you repeat 23 the question, pending question. 24 (Last question read.) 25 THE WITNESS: Yes.	Page 31 1 BY MR. ROSENBLATT: 2 Q. You do. How did you know to get that in 3 writing? 4 MR. GUTMAN: Same objection regarding the 5 attorney-client privilege. 6 THE WITNESS: We just put it in writing. That's 7 all. 8 BY MR. ROSENBLATT: 9 Q. Do you have a lot of experience with 10 intellectual property? 11 MR. GUTMAN: Objection. Vague. 12 BY MR. ROSENBLATT: 13 Q. Answer the question, please. 14 A. I would say, are you -- let me ask, are you 15 asking intellectual property as, say, like a song I 16 wrote or somebody wrote or things like that -- 17 Q. Yes. 18 A. -- as Guns N' Roses? 19 Well, I have experience with Guns N' Roses 20 intellectual property, I guess. 21 Q. What's your view of the art form of 22 photography? 23 MR. GUTMAN: Objection. Vague. Also harassing. 24 THE WITNESS: I think that's a really broad 25 question, and there is so many different genres in
Page 32 1 photography, but it depends. I mean, there's -- you 2 know, you have people -- camera phone pics, and 3 depending who has the camera phone in their hand, could 4 be a better quality pic. So there's a lot of different 5 things with photography. 6 BY MR. ROSENBLATT: 7 Q. Do you think Kat's a good photographer? 8 A. I couldn't say that. I wouldn't know now. 9 Q. At the time that she took pictures of Guns N' 10 Roses, did you think she was a good photographer? 11 A. I would say up to the last year or so. 12 Q. What happened then? 13 A. Well, it's my understanding that Kat wanted to 14 have a child and began some form of a hormone treatment, 15 and she became very emotionally erratic, and her photos 16 suffered. 17 Q. Did you see any of the photos? 18 A. I don't know. Yeah, I don't know. 19 Q. Do you ever approve of any photos? 20 MR. GUTMAN: You're talking at any time or just on 21 this period of time? 22 THE WITNESS: Personally? 23 MR. ROSENBLATT: Please stop coaching the witness, 24 Alan. 25 MR. GUTMAN: I'm asking for clarification on the	Page 33 1 question. 2 MR. ROSENBLATT: Alan, Alan. 3 Could we just note that Alan, I believe, is 4 trying to coach the witness. Mark the time please, 5 11:07. 6 MR. GUTMAN: Your conduct is unprofessional, and 7 you're not acting in a civil manner. I asked for 8 clarification. I'll state the objection. 9 The question is vague and ambiguous. 10 If you understand it, you can answer. 11 THE WITNESS: I'd like to hear it again, please. 12 MR. ROSENBLATT: Can you repeat the pending 13 question. 14 (Last question read.) 15 THE WITNESS: I generally approve photos through 16 others approving the photos. 17 BY MR. ROSENBLATT: 18 Q. Who did you delegate that approval power to? 19 A. Vanessa Santos, Beta Lebeis, and Fernando 20 Lebeis, and possibly Del James. 21 Q. So Fernando, Vanessa, and Beta all had the 22 power to approve of photographs of you? 23 A. Yes. 24 Q. And you delegated that power to them? 25 A. Yes.

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Page 34 1 Q. Did you ever recognize Kat as the owner of any 2 of the photographs of Guns N' Roses? 3 A. No. 4 Q. Have you ever been in a lawsuit against Slash? 5 MR. GUTMAN: Objection. Manifestly irrelevant. 6 Not reasonably calculated to lead to the discovery of 7 admissible evidence. 8 THE WITNESS: I think so. It's been a long time. 9 BY MR. ROSENBLATT: 10 Q. What do you mean by "it's been a long time"? 11 A. Well, we've been dealing with each other -- we 12 didn't talk for about 19 years, and we've been dealing 13 with each other for the last 12 without issue. So I 14 don't recall everything prior to 12 years ago. 15 Q. Have you ever been in a lawsuit against Duff? 16 MR. GUTMAN: Same objection. Manifestly 17 irrelevant. Not reasonably calculated to lead to the 18 discovery of admissible evidence. 19 THE WITNESS: I think so, but with the same -- 20 looking at it the same way. I don't really recall what 21 were our legal issues between each other prior to 12 22 years ago. Kind of let it all go. 23 MR. ROSENBLATT: That's good. 24 Do you remem- -- 25 MR. DEIXLER: Please don't comment on the witness's	Page 35 1 testimony. I've asked you now, I think, twice, or more, 2 perhaps. 3 BY MR. ROSENBLATT: 4 Q. Do you remember what the lawsuit was about at 5 all? Do you remember if it was about intellectual 6 property? 7 A. No, I don't. 8 MR. ROSENBLATT: Okay. 9 MR. DEIXLER: Counsel, please don't comment on the 10 witness's testimony. We'll assume every answer he gives 11 is okay, without you reciting it, please. 12 BY MR. ROSENBLATT: 13 Q. How did you verify that you own the photos? 14 A. To my understanding, it's in our contract with 15 Kat Benzova, and asking my attorneys. 16 Q. Which attorney? 17 A. Doug Mark, Alan, and Bert. 18 Q. Alan? 19 A. Yes, and Bert. 20 Q. And Bert. They told you you own the 21 photographs? 22 MR. DEIXLER: Excuse me, that invades the 23 attorney-client privilege. You know that. That 24 couldn't have possibly been a question asked in good 25 faith, Counsel. How dare you, after that long preamble
Page 36 1 about attorney-client privilege. Don't do that again. 2 BY MR. ROSENBLATT: 3 Q. Did you ask Fernando if you own the 4 photographs? 5 A. No. 6 Q. "No." Are you aware that there were no 7 written contracts from 2016 to 2021? 8 MR. GUTMAN: Objection. Assumes a fact. 9 THE WITNESS: I have no knowledge of whatever 10 you're saying. 11 BY MR. ROSENBLATT: 12 Q. Okay. Have you ever licensed any Guns N' 13 Roses photographs for any merchandising purposes? 14 A. I wouldn't know any details of that. I would 15 imagine so. 16 Q. Do you know Robert John? 17 A. Yes, I do. 18 Q. How do you know him? 19 A. He was our photographer during Appetite from 20 the club days on through Illusions and then till -- 21 through Illusions, and that was it. 22 Q. Did you ever buy any of his photographs? 23 A. Yes. 24 Q. When? 25 A. Somewhere in the '90s.	Page 37 1 Q. Was there a written contract when you bought 2 them? 3 A. Possibly. 4 Q. Did you ever write anything on behalf of 5 Robert John? 6 A. How do you mean? 7 Q. Did you ever author a literary work on behalf 8 of Robert John? 9 A. I don't recall. I don't -- I don't even -- I 10 don't even know what that questions means. 11 Q. Did you ever write a foreword to a book for 12 Robert John? 13 A. Oh. I may have written a foreword to his Guns 14 N' Roses photograph book, but I do not recall. I looked 15 at that book once in the '90s. Early '90s. 16 Q. Are you aware that Nightrain is a subscription 17 service? 18 MR. GUTMAN: Objection. Asked and answered. 19 THE WITNESS: You asked me that. I think so. 20 BY MR. ROSENBLATT: 21 Q. Did you ever use any of the photos taken by 22 Kat to promote concerts? 23 A. I believe so. 24 Q. Did you ever use any of the photos taken by 25 Kat on the Nightrain subscription service?

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Page 38 1 A. Possibly. 2 Q. Did you ever use any of the photos taken by 3 Kat on tickets? 4 MR. GUTMAN: What's the word? On... 5 THE REPORTER: "Tickets." 6 MR. ROSENBLATT: 7 Q. Tickets. Tickets for your concerts. 8 A. I haven't -- I don't know if I've even seen a 9 ticket to our concert in person, so... 10 BY MR. ROSENBLATT: 11 Q. It's a possibility? 12 MR. GUTMAN: Objection. Speculation. 13 THE WITNESS: I don't know if we have ticket -- 14 pictures on tickets. I don't know. I mean, the Lord's 15 Prayer could be on our tickets for all I know. 16 BY MR. ROSENBLATT: 17 Q. Have you ever e-mailed Katarina Benzova? 18 A. I don't recall. If I had, it wouldn't have 19 been in years. 20 Q. What's the purpose of Gundam Productions? 21 MR. GUTMAN: Objection. Vague. Foundation. 22 THE WITNESS: I would have to go over that to 23 answer that question. Otherwise, I don't know. I 24 don't -- I don't worry about the names of our companies, 25 really.	Page 39 1 BY MR. ROSENBLATT: 2 Q. What's the purpose of Waterhead? 3 MR. GUTMAN: Same objection. Vague. Foundation. 4 THE WITNESS: I don't know. That may be our 5 publishing company. I'm not sure which company is which 6 at this time. It's not something I really concern 7 myself all that much with. 8 BY MR. ROSENBLATT: 9 Q. Are they related, the companies? 10 MR. GUTMAN: Objection. Foundation. 11 THE WITNESS: Well, they are part of Guns N' Roses. 12 That's all I could answer. 13 BY MR. ROSENBLATT: 14 Q. They're all part of Guns N' Roses? 15 A. Yes. 16 MR. ROSENBLATT: Okay. 17 MR. DEIXLER: He just said that. Please don't 18 repeat his testimony, Counsel. Just ask questions. 19 BY MR. ROSENBLATT: 20 Q. Have you ever licensed a copyright to Lebeis 21 Publishing? 22 A. To... To what? 23 Q. Lebeis Publishing. 24 A. I don't know. 25 Q. Do you control and oversee Black Frog
Page 40 1 Entities? 2 A. Yes. 3 Q. Is it for profit? 4 A. I believe so. 5 Q. Is it a nonprofit corporation? 6 A. Oh, no, I -- 7 MR. GUTMAN: Objection. Argumentative. Also -- 8 THE WITNESS: I don't think so. 9 MR. GUTMAN: Pardon me one second, let me just 10 interpose the objection on the record. 11 Irrelevant. Not reasonably calculated to lead 12 to the discovery of admissible evidence. 13 Go ahead. 14 THE WITNESS: Could you repeat the question, 15 please. 16 MR. ROSENBLATT: Will you repeat the pending 17 question, please. 18 (Last question read.) 19 THE WITNESS: I don't think so, but I wouldn't -- 20 don't know the -- I don't know the difference, really, 21 in this situation. I think I answered earlier that 22 Black Frog is our publishing. My publishing. 23 BY MR. ROSENBLATT: 24 Q. Does it hold photographic copyrights? 25 A. I don't know.	Page 41 1 Q. Has it ever claimed to own photographs taken 2 by Katarina Benzova? 3 A. I don't know. 4 Q. Would you be surprised if it has? 5 A. No. Wait, did you say owned by her? 6 Q. Owned by Black Frog. 7 A. So owned -- her -- that the photos she took 8 are owned by me? 9 Q. Have you told any third parties that you own 10 the photographs -- 11 Has Black Frog Entities told anybody else, any 12 third party, that you own the photographs taken by 13 Katarina Benzova? 14 A. Possibly. 15 Q. Which third parties? 16 A. I don't know. 17 Q. Do you know what "sublicensing" means? 18 MR. GUTMAN: Can I hear it again? 19 (Last question read.) 20 THE WITNESS: Vaguely. 21 BY MR. ROSENBLATT: 22 Q. What do you think it means? 23 MR. GUTMAN: Objection. It calls for an improper 24 narrative. No foundation. 25 MR. ROSENBLATT: Noted.

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Page 42 1 THE WITNESS: That you're allowing someone else to 2 license the work. I'm not sure. I don't know that I 3 specifically sublicensed anything. But, you know, if I 4 were asked to and it made sense. 5 BY MR. ROSENBLATT: 6 Q. Has Black Frog Entities ever sold a calendar 7 using Katarina Benzova's photographs? 8 A. Well, I would say Guns N' Roses has put out 9 calendars, and I believe with the photographs that Kat 10 took. 11 Q. Did you sell those calendars? 12 A. I believe so. 13 Q. Where did you sell them? 14 A. Globally. 15 Q. Who did you cooperate with in order to make 16 those calendars? 17 A. I would imagine our merchandising company. 18 Q. What's your merchandising company's name? 19 A. I have no idea right now. 20 Q. Is it called Bravado? 21 A. Yes, I think so. 22 Q. Have you had a long-term relationship with 23 Bravado Merchandising? 24 A. I believe so. 25 Q. How long?	Page 43 1 A. Well, I would think maybe at least the last 12 2 years, if not the last 20. I don't know. I don't know 3 how many merchandising companies that I've worked with. 4 Q. Have you ever filed a lawsuit with Bravado 5 Merchandising, enforcing your intellectual property 6 rights? 7 A. I do not know. It's -- it's very possible. 8 Things like this happen all the time. 9 Q. Do they have the exclusive right to your Guns 10 N' Roses merchandising? 11 A. I don't know. 12 Q. Do you grant them photographs to use for the 13 merchandising? 14 A. I believe so. 15 Q. Did you tell Bravado that you own the 16 photographs? 17 A. Personally? 18 Q. Or through your agents. 19 A. I believe so. 20 Q. Did you put that in writing? Did you warrant 21 and represent that you own the photographs? 22 A. I was not personally involved. 23 Q. But you have a -- just, this is for me to 24 clarify in putting together. 25 So you have a long-term relationship with
Page 44 1 Bravado Merchandising, who may or may not be the 2 exclusive merchandising company for Guns N' Roses 3 merchandise? 4 A. Yes. 5 Q. And some of that merchandise uses photos taken 6 by Katarina Benzova? 7 A. I believe so. 8 Q. And how did they get those photographs to 9 them? 10 A. I don't know. 11 Q. Did you share any of the revenue from any of 12 the merchandise that used Kat's photos with Kat? 13 A. I don't know, but I don't believe so. 14 Q. Why not? 15 A. Because she has a salary. 16 Q. Were you aware there was no written contract 17 between Gundam and Katarina Benzova in 2020? 18 MR. GUTMAN: Objection. Foundation. Assumes 19 facts. 20 THE WITNESS: It's my understanding that there was 21 some issue with -- some issue with -- sorry -- 22 finalizing her renewal. 23 BY MR. ROSENBLATT: 24 Q. What do you mean? 25 A. That there was some issue with the paperwork	Page 45 1 but that we continued functioning with the belief that 2 that was going to be resolved or taken -- finalized at 3 some point, as that's fairly common with all kinds of 4 contract renewals. 5 Q. It's common -- 6 A. Yeah. 7 Q. -- not to finalize? 8 A. Yeah. Over the last 20 years, it's -- you 9 know, people -- you're dealing with so many different 10 people, it takes them different -- different people have 11 different time schedules on how they're getting their -- 12 their paperwork done or whatever, and you just gotta get 13 out on tour. You have your shows to do, and you do them 14 with the understanding that it's going to get worked 15 out, and it usually does. 16 Q. So it's a pattern and practice not to 17 necessarily have everything finalized before you go on 18 tour? 19 MR. GUTMAN: Objection. Argumentative. 20 THE WITNESS: In the music industry, I'd say as a 21 whole, yes. 22 BY MR. ROSENBLATT: 23 Q. With Guns N' Roses? 24 A. Yes. 25 MR. ROSENBLATT: Yeah.

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Page 46 1 MR. DEIXLER: Don't comment on his testimony, 2 please. 3 MR. ROSENBLATT: I apol- -- it's reactionary. It's 4 really not -- any malice in it. 5 MR. DEIXLER: It's very intimidating. 6 MR. ROSENBLATT: I don't believe so. 7 MR. DEIXLER: Well, don't do it, and we'll see. 8 BY MR. ROSENBLATT: 9 Q. Do you profit off of Guns N' Roses 10 merchandise? 11 A. Yes. 12 Q. How much did you profit from Guns N' Roses 13 merchandise last year? 14 A. I have no idea. 15 Q. Who would know? 16 A. Who what? 17 Q. Who would know? 18 A. Probably Bernie Gilhuly, my accountant. 19 Q. You initiated this lawsuit; correct? 20 A. I initiated what lawsuit? 21 Q. This lawsuit. 22 A. It was my understanding I was being sued. 23 Q. You're the plaintiff in this case. 24 A. Okay, so I'm the plaintiff. 25 MR. GUTMAN: That's absolutely incorrect. He's	Page 47 1 just making an argument. He's trying to identify the 2 plaintiff in the lawsuit, and saying "you," personally, 3 and it's not correct. You're not a plaintiff in the 4 lawsuit. 5 MR. ROSENBLATT: Court reporter, will you name the 6 plaintiffs in this lawsuit? Is that possible? 7 MR. DEIXLER: Are you being deposed? Do you want 8 to engage counsel? 9 MR. ROSENBLATT: I can do it. 10 Q. The plaintiffs in this lawsuit are Gundam 11 Productions, Gundam Touring, and Waterhead, Inc. They 12 initiated this lawsuit. 13 Are you aware of that? 14 A. No. 15 Q. This is the first time you've become aware of 16 that? 17 A. Yes. 18 Q. So you didn't know that you were the 19 plaintiff -- that Gundam, the companies that you're in 20 charge of -- 21 A. Well -- 22 MR. GUTMAN: Excuse me, excuse me. The question 23 has been asked and answered, and you're just harassing 24 the witness. It's argumentative. Ask a proper 25 question.
Page 48 1 MR. ROSENBLATT: Are you instructing him not to 2 answer? 3 MR. GUTMAN: You didn't ask a question. All you're 4 doing is making your argument. Ask a proper question. 5 MR. ROSENBLATT: Please repeat the last pending 6 question. 7 (Last question read.) 8 THE WITNESS: Well, I would say that it's quite 9 possible that we have a countersuit, and that generally 10 happens if -- when there's a lawsuit against Guns N' 11 Roses or myself, there's often a countersuit. So if 12 this is the countersuit, then this could be the first 13 time learning that I'm in a countersuit, but that's just 14 business, so... 15 BY MR. ROSENBLATT: 16 Q. You weren't informed that you were the 17 plaintiff? 18 A. Doesn't matter. 19 Q. Before initiating the lawsuit, were you aware 20 of which exact photos were contained in the 21 registrations? 22 A. In what registration? 23 Q. The registrations that are at issue in this 24 case. 25 MR. GUTMAN: Objection. Vague.	Page 49 1 THE WITNESS: I don't know any of these legal terms 2 about this case. 3 THE ROSENBLATT: Okay. 4 MR. DEIXLER: We'll assume it's okay. Whatever 5 answer he gives, we're just gonna -- just assume it's 6 okay. You needn't waste time saying it, Counsel. 7 BY MR. ROSENBLATT: 8 Q. Who's Alex Santos? 9 A. Beta Lebeis's son, and one of my accountants. 10 MR. ROSENBLATT: How much time are we on the 11 record? 12 THE VIDEOGRAPHER: We've been on the record 57 13 minutes, 58 seconds. 14 MR. ROSENBLATT: Are you guys okay if we take a 15 five-minute break or a ten-minute break? 16 MR. DEIXLER: I think we're good. Let's keep 17 going. 18 Unless you're tired. If Lisa's tired, then 19 we'll take a break. 20 THE REPORTER: I'm gonna use a break, yeah. 21 MR. DEIXLER: Okay, so we'll respect Lisa. But 22 otherwise, we'd like to just keep going. 23 THE VIDEOGRAPHER: We're going off the record. The 24 time is 11:32. 25 (Recess.)

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Page 50 1 THE VIDEOGRAPHER: We're back on the record. The 2 time is 11:43. 3 MR. ROSENBLATT: I just want to mark for the record 4 that Katarina Benzova's consulting attorney and 5 trademark attorney, Eric Bjorgum, is here. And I think 6 before -- we want to put on the record too that -- 7 Will you state your name for the record. 8 MR. GUTMAN: You don't have to say your name for 9 the record. 10 Fernando Lebeis is here. 11 MR. ROSENBLATT: And he has been since the 12 beginning of the deposition. And although Beta Lebeis 13 is not here now, she was here for the first 57 minutes 14 of the deposition. Okay. 15 Q. Were you involved in the case Weber v. Geffen 16 Records? 17 A. Yes. 18 Q. What was that case about? 19 A. I believe it was about Weber falsely saying 20 that he wrote parts of the song Anything Goes that he 21 did not write. 22 Q. Was it a dispute about copyright ownership? 23 A. I believe so. 24 Q. How many copyrights do you have registered? 25 A. I have no idea.	Page 51 1 Q. A lot? 2 MR. GUTMAN: Vague. Objection. 3 BY MR. ROSENBLATT: 4 Q. Over 10? 5 A. Yes. 6 Q. Over 20? 7 A. I believe so. 8 Q. Over 30? 9 A. Yes. 10 Q. Over 40? 11 A. I would think so. 12 Q. Over 50? 13 A. I would think so. 14 Q. Have you ever been involved in a trademark 15 case called Guns N' Roses v. Texas Guns and Roses, LLC? 16 A. I have no idea. 17 Q. Have you been served in a litigation called 18 Rose vs. Activision Blizzard Incorporation? 19 A. Yes. 20 Q. What was that about? 21 A. Their use of Guns N' Roses songs in a version 22 of their Guitar Hero video game. 23 Q. It was a copyright infringement case? 24 A. I believe so. 25 Q. Do you have immediate access to legal counsel
Page 52 1 for all Guns N' Roses business matters? 2 A. Yes. 3 Q. Okay, I want to get back to a topic that we 4 had before. 5 So, are you aware that you're not -- that the 6 plaintiffs in this case are not claiming to have an 7 ownership interest in the photographs at issue? 8 A. I do not know. 9 Q. You don't know if you're aware? 10 A. "I don't know" is my answer to the question 11 you asked. 12 MR. ROSENBLATT: Will you repeat the pending 13 question. 14 Q. Do you need me to clarify it? I'll clarify 15 it. 16 A. Yes, please. 17 Q. Okay. Are you aware that the plaintiffs in 18 this case are not claiming to own any of the photographs 19 that are at issue in this case? 20 MR. GUTMAN: Objection. Asked and answered. 21 THE WITNESS: No, I do not know that that is the 22 case. 23 BY MR. ROSENBLATT: 24 Q. Are you just becoming aware of that right now? 25 A. I don't know --	Page 53 1 MR. GUTMAN: Objection. Argu- -- 2 THE WITNESS: -- I still don't know that that's the 3 case. 4 MR. GUTMAN: Objection. Argumentative. Assumes a 5 fact. 6 THE WITNESS: I know it's something that it seems 7 to be you're saying, but I don't know that that is the 8 case. I have not consulted counsel. 9 BY MR. ROSENBLATT: 10 Q. But you're under the present impression that 11 you are the absolute owner of all the photographs at 12 issue in this case? 13 A. Yes. 14 MR. GUTMAN: Asked and answered about 20 times. 15 BY MR. ROSENBLATT: 16 Q. Do you understand that a work for -- a work 17 made for hire requires specific conditions to be met? 18 A. No. 19 Q. Are you aware that photographs are not one of 20 the enumerated categories that qualify for a work for 21 hire? 22 A. I do not know. 23 Q. Do you know the difference between an employee 24 and an independent contractor? 25 MR. GUTMAN: Objection. Calls for a legal

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Page 54 1 conclusion. Foundation. 2 MR. ROSENBLATT: Are you instructing him not to 3 answer? 4 THE WITNESS: I think there can be differences, and 5 sometimes they are the same. 6 BY MR. ROSENBLATT: 7 Q. You do not believe that they're mutually 8 exclusive? 9 MR. GUTMAN: Objection. Vague. Foundation. 10 THE WITNESS: I don't think so. I don't know. 11 BY MR. ROSENBLATT: 12 Q. Do you think you can be part employee, part 13 independent contractor, for the same company? 14 MR. GUTMAN: Objection. Vague. 15 THE WITNESS: I wouldn't know. I would have to 16 ask. 17 BY MR. ROSENBLATT: 18 Q. Do you understand that unauthorized use of 19 somebody else's copyrighted photograph can constitute 20 copyright infringement? 21 MR. GUTMAN: Objection. Speculation. Foundation. 22 Also calls for a legal conclusion. 23 THE WITNESS: Possibly. 24 BY MR. ROSENBLATT: 25 Q. Approximately how many years did Ms. Benzova	Page 55 1 work with Guns N' Roses? 2 A. I was thinking about that today, and I am not 3 exactly sure what year she became involved with Guns N' 4 Roses. I don't know if it was 2007 or like 2010. I 5 don't know. 6 Q. Did she work continuously for Guns N' Roses? 7 A. When we were touring, yes. 8 Q. Did you tour continuously? 9 A. How do you mean "continuously"? 10 Q. No interruptions? 11 A. There's always interruptions. 12 Q. So not continuously? 13 MR. GUTMAN: Objection. Argumentative. Vague. 14 THE WITNESS: Well, I know that -- it's my 15 understanding she was on a yearly salary. So that would 16 cover the breaks in touring. 17 BY MR. ROSENBLATT: 18 Q. You thought she was paid while not on tour? 19 A. I do not know exactly. 20 Q. Who told you that? 21 A. Who told me what? 22 Q. That she was paid while not on tour. 23 MR. GUTMAN: Assumes a fact. 24 THE WITNESS: No one. 25 ///
Page 56 1 BY MR. ROSENBLATT 2 Q. Are you assuming that she was paid? 3 A. I'm assuming that she was paid for the year 4 and if we needed her in between tour legs, that some 5 form of arrangements would be made. And we didn't have 6 any issues with that, as far as I'm aware of, with her. 7 There weren't any problems. 8 Q. Who determined her payment? 9 A. Management, the attorneys, and myself in the 10 sense of I would be made aware of what contract was 11 being negotiated and how it was going and if it was good 12 or not, and I would trust my people if they would tell 13 me if it was good or not. 14 Q. Did you see the contract that was presented to 15 her in August of 2021? 16 A. No. 17 MR. ROSENBLATT: "No." 18 MR. DEIXLER: Please don't repeat his answer. Just 19 ask your next question, Counsel. 20 BY MR. ROSENBLATT: 21 Q. Who would have seen that contract? 22 MR. GUTMAN: Objection. Speculation. Foundation. 23 THE WITNESS: I believe Doug Mark. 24 BY MR. ROSENBLATT: 25 Q. And who's Doug Mark? What's his role?	Page 57 1 A. An attorney for myself and Guns N' Roses. 2 Q. Does he work at the Canoga office? 3 MR. GUTMAN: I'm sorry, I couldn't hear the 4 question. There was some background noise. 5 MR. ROSENBLATT: Yeah, one moment. Beta Lebeis has 6 just entered. 7 THE WITNESS: Hand me the sweatshirt, please. 8 MR. GUTMAN: Counsel -- 9 THE WITNESS: One moment while I put my sweatshirt 10 on. 11 MR. ROSENBLATT: No problem. 12 MR. GUTMAN: Counsel, it would also help if you 13 could keep your voice up. You tend to start speaking 14 down, and it's a little bit difficult to hear you. 15 MR. ROSENBLATT: I'll try my best, Mr. Gutman. 16 Okay, we're back on the record. 17 Q. So Doug Mark is an attorney at -- 18 Did he write that contract, the August 2021 19 contract? 20 MR. GUTMAN: Objection. Foundation. 21 THE WITNESS: I do not know. I would think so. 22 BY MR. ROSENBLATT: 23 Q. Are you aware that there was no written 24 contracts after August of 2021? 25 MR. GUTMAN: Objection. Speculation.

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Page 58 1 THE WITNESS: I would think so. 2 BY MR. ROSENBLATT: 3 Q. Is it practice of Guns N' Roses not to have 4 written contracts when dealing with photographers? 5 MR. GUTMAN: Objection. Foundation. 6 THE WITNESS: Well, at some point, we weren't 7 working with Kat anymore. So then I don't know what 8 contract there would be. 9 BY MR. ROSENBLATT: 10 Q. Did you approve of payments to Ms. Benzova? 11 A. In the general sense, yes. 12 Q. Did you review or approve any of the contracts 13 that were presented to Ms. Benzova? 14 A. Actual -- 15 MR. GUTMAN: Excuse me. Objection. Compound. 16 Go ahead. 17 THE WITNESS: Actual physical contract? 18 BY MR. ROSENBLATT: 19 Q. Did you review any of the written contracts? 20 A. So what I'm asking is, the actual physical 21 contract, like a piece of paper? 22 Q. I guess it could be delivered to you in an 23 e-mail -- 24 A. Or e-mail. 25 Q. -- or digitally or something.	Page 59 1 A. I would say no. 2 Q. "No." Why did you not review those? 3 A. No need. 4 Q. Who handled, then? Who reviewed them on your 5 behalf? 6 A. Doug Mark and Fernando Lebeis. 7 Q. Did Fernando Lebeis serve as the primary point 8 of contact for Ms. Benzova? 9 A. Yes. 10 Q. Did Fernando Lebeis control which photographs 11 were posted to Guns N' Roses social media? 12 A. I have no idea. I would say possibly at 13 times. 14 Q. Did Vanessa Santos control which photographs 15 were posted on Guns N' Roses social media? 16 A. Vanessa, Beta, and Fernando were all involved 17 with the photos at different times, and where they were 18 used, I would not necessarily know. 19 Q. And you delegated that authority -- 20 A. Yes. 21 Q. -- to them? 22 And no one else except for them had that 23 authority? 24 A. Possibly Del James at times, but I do not know 25 that for sure.
Page 60 1 Q. Do you understand that you're responsible for 2 the actions of Fernando Lebeis? 3 MR. GUTMAN: Objection. Misstates the law. 4 Foundation. Argumentative. 5 THE WITNESS: I do not know the legal exacts of 6 that, no. 7 BY MR. ROSENBLATT: 8 Q. Is Fernando Lebeis an agent of yours? 9 A. Or to what extent. 10 Yes. 11 MR. GUTMAN: Objection -- let me just interpose the 12 objection. 13 Objection. Calls for a legal conclusion. 14 THE WITNESS: Yes. I don't know the legal exact 15 term for that, but I would think so. 16 BY MR. ROSENBLATT: 17 Q. Did Fernando Lebeis have the authority to 18 terminate Ms. Benzova's services? 19 A. Yes. 20 Q. Did you delegate him that authority? 21 A. Yes. 22 Q. Did you approve of a document that was given 23 to Ms. Benzova in October of 2022? 24 MR. GUTMAN: Objection. Assumes a fact. 25 THE WITNESS: I do not -- I'm not aware of any	Page 61 1 particular document. 2 BY MR. ROSENBLATT: 3 Q. Were you aware that Fernando Lebeis said he 4 loved Katarina Benzova? 5 A. In what sense? 6 MR. ROSENBLATT: Repeat the question. 7 (Last question read.) 8 THE WITNESS: Loved her in what sense, sir? 9 BY MR. ROSENBLATT: 10 Q. That he said, "I love you" to her. 11 A. In what sense, sir? 12 Q. In an intimate sense. 13 A. Absolutely not. 14 Q. Would it surprise you if he sent her 15 inappropriate intimate texts? 16 MR. GUTMAN: Objection. Argumentative. Assumes a 17 fact. Misstates the evidence. 18 THE WITNESS: Yes. 19 BY MR. ROSENBLATT: 20 Q. Would you approve of that behavior? 21 MR. GUTMAN: Pardon me, if it's the question, what 22 behavior? 23 THE WITNESS: Yes. 24 BY MR. ROSENBLATT: 25 Q. Would you approve of the manager of Guns N'

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Page 62 1 Roses sending intimate texts to members of the crew? 2 MR. GUTMAN: I'm sorry, did you finish your 3 question? 4 THE WITNESS: It would de- -- 5 MR. GUTMAN: Hold on one second. 6 Have you finished the question? 7 MR. ROSENBLATT: Repeat the pending question. 8 (Last question read.) 9 MR. GUTMAN: Let me interpose an appropriate 10 objection. It is an incomplete hypothetical. No 11 foundation. Assumes facts. It calls for speculation. 12 And argumentative. 13 THE WITNESS: I don't necessarily involve myself 14 with anyone in our organization's personal 15 relationships. If there was a personal relationship 16 between somebody, their e-mails are their e-mails. Or 17 texts, whatever their form of communication is. 18 BY MR. ROSENBLATT: 19 Q. Have you ever seen photographs of Guns N' 20 Roses published in Rolling Stone magazine? 21 A. Yes. 22 Q. Did you approve or license a photo to Rolling 23 Stone magazine in 2021? 24 A. I have no idea. 25 Q. Who would know?	Page 63 1 A. Possibly Doug Mark and Fernando Lebeis. 2 Q. Did Fernando -- is it "Le-BASE" or "Le-BEES"? 3 I don't wanna mispronounce his name. 4 A. Either. Either. It's Brazilian Portuguese, 5 and it's pronounced different ways different places. 6 Q. Did Fernando Lebeis have the authority to 7 license Guns N' Roses photographs? 8 A. I'm not completely sure of the term "license." 9 So I don't personally know exactly what that means. If 10 you mean like we sending a photo that we own to, say, 11 Rolling Stone for them to use, then I would say yes. 12 Q. Have you ever seen photographs of Guns N' 13 Roses published in the magazine Classic Rock magazine? 14 A. Years ago, like the '90s. Early '90s. 15 Q. Did you give Classic Rock magazine the 16 permission to use a photo of you? 17 A. Personally, no. But I'm not aware of our 18 involvement with Classic Rock magazine since '91 and 19 '92. That doesn't mean that we're not involved with 20 them. That doesn't mean that we're not involved with 21 them now. But I personally am not involved with Classic 22 Rock, nor have I looked at anything to do with Classic 23 Rock since '91 or '92. 24 Q. Do you have a written contract with Bravado 25 Merchandising?
Page 64 1 A. I would think so. That's all I know. 2 Q. Who would know? 3 A. Doug Mark. 4 Q. Did you ever sign the contract with Bravado 5 Merchandising? 6 A. It's possible. I don't recall. 7 Q. Does Fernando Lebeis have the capacity to sign 8 on your behalf? 9 MR. GUTMAN: Objection. Foundation. 10 THE WITNESS: In certain situations like, say, that 11 contract with Bravado, yes. 12 BY MR. ROSENBLATT: 13 Q. Fernando Lebeis has the -- just, this is for 14 me to clarify. 15 Fernando Lebeis has the authority to sign on 16 your behalf contracts with Bravado Merchandising? 17 MR. GUTMAN: Objection. Foundation. 18 THE WITNESS: Yes. 19 BY MR. ROSENBLATT: 20 Q. And you granted him that authority? 21 A. Yes. 22 Q. When did you grant him that authority? 23 A. When he became the manager of Guns N' Roses. 24 Q. Which date was that? 25 A. So, as I said, that's like 2011, 2012.	Page 65 1 Q. Did he manage any other bands before Guns N' 2 Roses? 3 A. No. 4 Q. Does he manage any other bands now? 5 A. Not that I'm aware of. 6 Q. Does he have an exclusive contract with Guns 7 N' Roses? 8 A. I don't believe so. 9 Q. Is his compensation based on a percentage of 10 revenue earned? 11 A. I believe so. 12 Q. What's his percentage? 13 MR. GUTMAN: Objection. Manifest- -- 14 THE WITNESS: I don't -- 15 MR. GUTMAN: Excuse me. I'm gonna instruct the 16 witness not to answer, private information. Manifestly 17 irrelevant. Not reasonably calculated to lead to the 18 discovery of admissible evidence. 19 MR. ROSENBLATT: Did you instruct him not to 20 answer? 21 MR. GUTMAN: I did, yes. 22 BY MR. ROSENBLATT: 23 Q. Do you receive royalty payments from Bravado? 24 A. I believe so. 25 Q. Have you ever shared any of those royalty

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Page 66 1 payments with Katarina Benzova? 2 MR. GUTMAN: Asked and answered. 3 THE WITNESS: I don't know. 4 BY MR. ROSENBLATT: 5 Q. What's the Guns N' Roses image? 6 MR. GUTMAN: I'm sorry, what's the Guns N' Roses... 7 MR. ROSENBLATT: Their image. 8 MR. GUTMAN: Objection. Vague and ambiguous, 9 unintelligible. 10 THE WITNESS: I have no idea. 11 BY MR. ROSENBLATT: 12 Q. Have you ever authorized Team Brazil 13 Management, Inc., to distribute photographs to media 14 outlets on behalf of Guns N' Roses? 15 A. Yes. 16 Q. Have you ever authorized Fernando Lebeis to 17 handle publicity and press relations for Guns N' Roses? 18 A. Yes. 19 Q. Do you approve of the terms of use posted on 20 www.gunsnroses.com that address photographic copyrights? 21 MR. GUTMAN: Can I have the question back? 22 THE WITNESS: I'm not aware of them. 23 MR. GUTMAN: One sec. You know what, don't worry. 24 BY MR. ROSENBLATT: 25 Q. Did you authorize the placement of Guns N'	Page 67 1 Roses' trademark logo on photographs before they were 2 distributed? 3 MR. GUTMAN: Objection. Foundation. 4 THE WITNESS: Could you clarify the question, 5 please. 6 BY MR. ROSENBLATT: 7 Q. Are you aware that some of the photographs at 8 issue in this case have the Guns N' Roses logo stamped 9 on them? 10 MR. GUTMAN: Objection. Foundation. 11 THE WITNESS: I am not aware. 12 BY MR. ROSENBLATT: 13 Q. As the principal of the plaintiffs, do you 14 approve of the overall publicity strategy for Guns N' 15 Roses that includes the distribution of photographs to 16 the media? 17 MR. GUTMAN: Objection. Compound. Vague, 18 ambiguous, unintelligible. Foundation. 19 THE WITNESS: Do you mean do I approve of how we do 20 things, basically? 21 MR. ROSENBLATT: Yes. 22 THE WITNESS: Yes. 23 BY MR. ROSENBLATT: 24 Q. Do you create the publicity strategy? 25 MR. GUTMAN: Objection. Foundation. Vague and
Page 68 1 ambiguous. 2 THE WITNESS: I'm part of it. 3 BY MR. ROSENBLATT: 4 Q. Do you have the authority to hire or fire 5 Fernando Lebeis as manager of Guns N' Roses? 6 A. Yes. 7 Q. Was hiring Fernando Lebeis a joint decision 8 between you and Duff and Slash, or did you make it 9 unilaterally? 10 A. They weren't involved at the time that 11 Fernando became the manager. 12 Q. So you made it on your own? 13 A. Yes. 14 Q. Do you have the authority to hire or fire Beta 15 Lebeis as your personal manager? 16 A. Yes. 17 Q. Can you overrule any decision made by Fernando 18 Lebeis regarding Guns N' Roses publicity? 19 A. As far as I know, yes. 20 Q. Is there anybody that's limiting your power? 21 A. In what sense? 22 Q. To make any decision regarding photographic 23 distribution of the band. 24 A. Well, I do not involve myself with Duff or 25 Slash's individual photos. And if we're all involved in	Page 69 1 the photo, everyone still has a say-so, whether they 2 approve that photo or not, meaning Duff and Slash can 3 say -- I can go, "I love me in this. I want to use 4 this," and they could say, "I hate me in this, and I 5 would really appreciate if you didn't." So then we just 6 don't. 7 Q. So you guys approve of photos of the band 8 together? 9 MR. GUTMAN: Objection. Misstates the prior 10 response. 11 THE WITNESS: Yes. Not physically in person 12 together, but yes. 13 BY MR. ROSENBLATT: 14 Q. You share authority about which photos get 15 distributed? 16 A. Yes. They can do whatever they want with 17 their photos, basically. Or photos of themselves. 18 Q. So as long as the photo doesn't involve you in 19 it? 20 A. Correct. 21 Q. And then if the photo does involve you in it, 22 then -- 23 A. Yeah, or if it was Slash and Duff and say 24 Slash liked him but Duff didn't like himself in it, 25 well, then they would either not do the photo or sort

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Page 70 1 out how to remove Duff from it, and they would come to 2 an agreement between themselves about it. 3 Q. So what's the criteria about how you decide 4 which photo should be distributed and which one should 5 not? 6 A. Just in looking at it, or have someone else 7 look at it, and what you -- what the individual thinks 8 of the photo themselves or those that they've delegated 9 to approve the photos for them. 10 Q. Do you consider any of the photos taken by 11 Katarina Benzova to be fine art? 12 MR. GUTMAN: Objection. Vague and ambiguous. 13 THE WITNESS: I do not know what the definition of 14 "fine art" would be in regard to her photographs or not. 15 BY MR. ROSENBLATT: 16 Q. Do you think it's possible for a photograph to 17 be fine art? 18 MR. GUTMAN: Objection. Speculation. 19 THE WITNESS: I think that it would depend on 20 possibly who's saying so, and then you could contest it 21 if you disagreed. 22 BY MR. ROSENBLATT: 23 Q. So it's subjective? 24 MR. GUTMAN: Objection. Argumentative. 25 Foundation. Vague and ambiguous.	Page 71 1 THE WITNESS: That's my guess. 2 BY MR. ROSENBLATT: 3 Q. Do you own any fine art? 4 MR. GUTMAN: Objection. Vague and ambiguous. 5 THE WITNESS: Well, that depends on who's looking 6 at it, on what their opinion is. They could think it's 7 crap. 8 BY MR. ROSENBLATT: 9 Q. Like a painting? 10 A. Yes. 11 Q. What is an artist that you consider a fine 12 artist? 13 MR. GUTMAN: Objection. Manifestly irrelevant. 14 Completely harassing. It's not reasonably calculated to 15 lead to the discovery of admissible evidence. 16 MR. ROSENBLATT: Noted. Are you gonna instruct him 17 not to answer? 18 MR. DEIXLER: Answer that, and we're gonna stop 19 this line. 20 MR. GUTMAN: Yeah, you can answer, who do you 21 consider -- 22 THE WITNESS: Da Vinci, Van Gogh, Salvador Dali, 23 Andy Warhol, Gerhard Richter. The list goes on. Damien 24 Hirst. It depends, you know. It's subjective. Someone 25 could like or not like one of those. It's like if you
Page 72 1 asked my stepfather, he'd say they were all crap, 2 because he's an idiot. 3 BY MR. ROSENBLATT: 4 Q. Do you have any photographs taken by Andy 5 Warhol? 6 A. Yes, I do. 7 Q. Do you know what VARA is? 8 A. I've heard the name, but no, I couldn't tell 9 you. 10 Vera was the name of the girl that I told you 11 about in church as a little kid. My first crush, sorry. 12 I couldn't remember her name the other day. I knew it 13 started with a V. 14 Q. Are you aware of the right of attribution? 15 A. I do not know what that is. 16 Q. Have you ever seen photographs of Guns N' 17 Roses used in connection with Ernie Ball guitar string 18 advertising? 19 A. Not personally, no. 20 Q. Have you been informed that they've been used 21 in connection with Ernie Ball guitar string advertising? 22 A. Ernie Ball is a famous guitar string maker, 23 and I would only just be able to assume that the guys 24 may -- probably use Ernie Ball strings. And so there 25 may have been -- their photos may have been used. Or	Page 73 1 our photos. I wouldn't know. 2 Q. Did you ever see the photograph of you that 3 was used in connection with the HYT watch advertising? 4 A. Are you talking about -- there was a -- I saw 5 a photo of my wrist with a watch and bracelets and rings 6 on it, of my right hand. 7 Q. Did you have a deal with HYT watch 8 advertising? 9 A. I believe so. 10 Q. What was the terms of those deal -- 11 What was the terms of that deal? 12 A. They gave me a couple watches. 13 Q. Did you share in any of their revenue? 14 A. With who? 15 Q. HYT watch? 16 A. I don't recall. Actually, I would say I don't 17 believe so. I got -- I was paid with two watches. 18 Q. How much is each watch worth? 19 A. Today, I wouldn't know. And then, I believe 20 that one was somewhere around 75- to \$100,000, and 21 another was somewhere north of \$150,000, at least 22 publicly, MSRP. 23 Q. Did you ever receive any reports about how 24 many followers there are to the Guns N' Roses social 25 media account?

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Page 74 1 A. I do not concern myself with that. 2 Q. Who does? 3 MR. GUTMAN: Objection. Speculation. 4 THE WITNESS: I would imagine Fernando Lebeis and 5 anyone that we have working with our social media 6 accounts. 7 BY MR. ROSENBLATT: 8 Q. Do you use any metrics to track the Nightrain 9 subscription service, including subscriber numbers? 10 A. I personally do not, no. 11 Q. Do you know who would? 12 MR. GUTMAN: Objection. Speculation. 13 THE WITNESS: I could say -- my understanding would 14 be management. 15 BY MR. ROSENBLATT: 16 Q. Fernando Lebeis? 17 A. Yes. 18 Q. Beta? Vanessa? 19 A. I do not know if Beta or Vanessa would be 20 involved with that, no. 21 MR. ROSENBLATT: We're gonna mark this exhibit as 22 101. We're gonna come back to the other ones. We're 23 gonna start here at 100. 24 (Defendant's Exhibit 101 was marked.) 25 THE WITNESS: Vera, I haven't thought of that name	Page 75 1 in 50 years. 2 MR. ROSENBLATT: I was referring to VARA, V-A-R-A. 3 MR. GUTMAN: This is Exhibit 101? 4 MR. ROSENBLATT: Mm-hmm. 5 MR. GUTMAN: That's a yes? 6 MR. ROSENBLATT: Yes. 7 Q. Is it your present impression that you own 8 that photograph? 9 A. I do not know who took the photograph. 10 Q. Kat took the photograph. So -- 11 A. Well, then -- 12 MR. GUTMAN: Well, hold on one second. Let me 13 state an objection. Foundation. 14 Counsel is attesting as to what he believes to 15 be the ownership or who took the photograph. You don't 16 necessarily have to believe what he's telling you. If 17 you know, you can answer. 18 THE WITNESS: I do not know. If she did, then I 19 would say yes, I own it. 20 BY MR. ROSENBLATT: 21 Q. Do you have a written document that 22 demonstrates Kat gave you permission for them to use 23 that photograph? 24 MR. GUTMAN: Objection. Asked and answered. 25 THE WITNESS: I'm not aware of having to ask Kat
Page 76 1 permission for anyone to use the photographs she's taken 2 of us that we choose to use. 3 BY MR. ROSENBLATT: 4 Q. You don't feel the need to ask for her 5 permission to use photographs for a third party? 6 MR. GUTMAN: Objection. Argumentative. Asked and 7 answered. 8 THE WITNESS: Correct. 9 MR. ROSENBLATT: I'll have this go in as 102. 10 (Defendant's Exhibit 102 was marked.) 11 MR. DEIXLER: Can we have a copy, please? Don't 12 give the witness a copy before you provide it to 13 counsel. You're gonna follow as though this were a 14 proceeding in court. 15 MR. ROSENBLATT: I apologize. 16 MR. BJORGUM: Usually you give it to her, and she 17 gives it to him. 18 MR. DEIXLER: We don't have time for a tutorial 19 here. It's too late for that. 20 MR. BJORGUM: You guys are giving a tutorial as 21 well, coaching the client. 22 MR. DEIXLER: That's not true. Stop talking. 23 MR. BJORGUM: Go ahead. 24 BY MR. ROSENBLATT: 25 Q. Do you recognize this photograph?	Page 77 1 A. Not particularly, no. 2 Q. Is that you in the photograph? 3 A. I think so. 4 Q. Is that Guns N' Roses? 5 A. I believe so. 6 Q. Can you read what it says underneath you? 7 A. South American Tour 2022, Quinta, 01 de 8 Setembro, Arena Da Amazonia - Manaus, AM. 9 Q. Do you know what this photograph was used for? 10 A. Apparently, what I just read. 11 Q. Was it used on any packaging? 12 A. I do not know. 13 Q. Was it used on a DVD that Guns N' Roses sold? 14 A. I do not know. 15 Q. Have you ever sold a DVD of Guns N' Roses 16 concerts? 17 A. Yes. 18 Q. When? 19 A. 2012. 20 Q. You haven't sold any DVD's of concerts 21 recently? 22 A. I don't know. 23 Q. Did you sell one in 2022? 24 A. I do not know. Not -- I'm not aware of one, 25 but that doesn't mean one wasn't sold, and especially if

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Page 78 1 it was from South America. 2 Q. Why do you say that? 3 A. Because it's -- bootlegging is rampant there, 4 and there is absolutely nothing you can do about it. 5 Q. Are you claiming that that photograph is part 6 of a bootleg DVD or a Guns N' Roses authorized DVD? 7 MR. GUTMAN: Objection. Argumentative. Misstates, 8 mischaracterizes prior testimony. 9 THE WITNESS: I do not know, but that could be a 10 possibility, yes. There are certain things that in the 11 business of touring in certain areas, that you just 12 don't worry about. You could get shot. 13 BY MR. ROSENBLATT: 14 Q. I'm confused. It's dangerous? Tell me more 15 about that. 16 MR. GUTMAN: Objection. Ask a proper question. 17 BY MR. ROSENBLATT: 18 Q. Why is it dangerous? Why would you get shot? 19 MR. GUTMAN: Objection. Manifestly irrelevant. 20 Not reasonably calculated to lead to the discovery of 21 admissible evidence. 22 THE WITNESS: If you were to interfere with 23 bootlegging at various -- in various countries, as the 24 police departments are involved with the bootlegging, 25 you could find yourself in a world of hurt, as others	Page 79 1 have, attempting to stop or interfere with the 2 bootlegging. 3 BY MR. ROSENBLATT: 4 Q. You've known people that have tried to 5 interfere with bootlegging? 6 A. There have been people, yes, and they were 7 killed by the police. 8 Q. In Brazil? 9 A. Yes. 10 Q. In Uruguay? 11 A. I don't know. 12 Q. Argentina? 13 A. I believe so. I know they killed a horse in 14 Argentina. The police killed a police horse in 15 Argentina. They got in an argument. But in Colombia, 16 they use tanks. 17 Q. So, do you supervise the activities of Team 18 Brazil Management? 19 MR. GUTMAN: Objection. Vague and ambiguous. 20 THE WITNESS: In what sense? 21 BY MR. ROSENBLATT: 22 Q. Do you have oversight to reverse any of their 23 decisions? 24 A. I believe so, yes. Well, it's not their 25 decisions. It's also our decisions, meaning that I'm
Page 80 1 part of Team Brazil, the owner of Team Brazil. 2 Q. Are you a manager or director of Team Brazil? 3 A. I can barely manage myself. 4 Q. Formally, as a matter of the Secretary of 5 State's records? 6 A. I don't believe so. 7 Q. So, did you approve the photographs that were 8 used in the Guns N' Roses calendar? 9 A. Indirectly, I believe so, yes. 10 Q. All of them? 11 A. Well, I would -- I have no issue with what -- 12 I haven't had any issues that I'm aware of with whatever 13 photos Duff or Slash have chosen of themselves. And so 14 in that sense, I've approved their photos, as well as 15 mine. 16 Q. Do you know what Danilo calendars is? 17 A. No, I do not. 18 Q. Would you be surprised if Danilo Promotions 19 published a calendar that's claimed to be owned by Black 20 Frog Entities? 21 A. No, I would not be surprised. 22 Q. Did you approve of that publishing deal? 23 MR. GUTMAN: Objection. Foundation. Assumes a 24 fact. Speculation. 25 MR. ROSENBLATT: We'll come back.	Page 81 1 THE WITNESS: Indirectly, I -- probably. 2 BY MR. ROSENBLATT: 3 Q. Did you receive profits from a calendar 4 published by Danilo Promotions in 2017? 5 A. I do not know. If that's someone who legally 6 made our calendar, then I would assume so. 7 Q. Have you ever written the words "the better 8 the photo, the more appealing the product"? 9 A. I do not recall. I don't recall that. I have 10 no idea. It sounds like a marketing term. Maybe. 11 Q. Do you believe photographs can increase 12 revenue-generating? 13 MR. GUTMAN: Objection. Vague and ambiguous. 14 Foundation. Speculation. Incomplete hypothetical. 15 THE WITNESS: I personally, for a very long time, 16 don't care about photographs of myself or the band. It 17 means nothing to me. 18 BY MR. ROSENBLATT: 19 Q. You don't care if you own them or not? 20 MR. GUTMAN: I'm sorry, I didn't hear the question. 21 (Last question read.) 22 THE WITNESS: I do care that I own them, but I 23 don't care about looking at the photos or really how we 24 use them. It doesn't -- I concern myself with 25 performing the show. And that's mostly where my focus

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Page 82 1 is. 2 BY MR. ROSENBLATT: 3 Q. Why do you care about owning the photographs? 4 MR. GUTMAN: Objection. Argumentative. 5 Foundation. 6 THE WITNESS: The attempt to deal with their usage 7 for however Guns N' Roses or the label or merchandise 8 company or publicist may see fit. 9 BY MR. ROSENBLATT: 10 Q. You want to control the image of Guns N' Roses 11 with respect to merchandise? 12 A. Are you talking about visual image, how 13 they -- 14 Q. Yes, the visual image. 15 A. I feel that in today's world, and for a long 16 time, especially with camera phones, my particular 17 relationship with media outlets, especially in the rock 18 world, it's been very difficult to deal with any type of 19 control with photos or how photos are used at all. To 20 me, it's a very ugly world dealing with media and 21 photos. 22 So can you repeat the question so I could try 23 to answer that clearly. 24 MR. ROSENBLATT: Can you repeat the question. 25 (Record read as follows: "You want to control	Page 83 1 the image of Guns N' Roses with respect to 2 merchandise?") 3 THE WITNESS: You're talking about the visual 4 image, like you see what we look like? 5 MR. ROSENBLATT: Yes, but I also want to know -- 6 THE WITNESS: Okay, I mean, because image can be an 7 opinion of -- 8 MR. ROSENBLATT: Yeah, it's -- 9 THE WITNESS: -- somebody's opinion. 10 MR. DEIXLER: We haven't broken up into small 11 discussion groups. So please allow him to finish 12 speaking before you speak again. 13 THE WITNESS: Please repeat the question, sorry. 14 (Record read as follows: "You want to control 15 the image of Guns N' Roses with respect to 16 merchandise?") 17 THE WITNESS: In regards to merchandise... Yes. 18 To what extent possible, yes. 19 BY MR. ROSENBLATT: 20 Q. To the maximum degree possible? 21 A. Yes. 22 Q. Do you want to control the image of Guns N' 23 Roses with respect to advertising to the maximum degree 24 possible? 25 A. Yes.
Page 84 1 Q. Do you want to control the image of Guns N' 2 Roses with respect to concert promotion to the maximum 3 degree possible? 4 A. Yes. 5 Q. Do you have any bans on photography at any of 6 your concerts? 7 A. How do you -- bans like as in no photography? 8 Q. Or a limitation somehow. 9 A. Well, it depends when you're talking about as 10 well. Once camera phones were there, there's not a lot 11 you can do. I don't believe we allow the public to be 12 using professional cameras. In '91, we had on our 13 tickets, "no cameras, no photographs" and then that was 14 not honored by the venue security in St. Louis. 15 Q. Did that upset you? 16 A. Absolutely. 17 Q. Can you tell me why? 18 MR. DEIXLER: Well, we're not in therapy. It's 19 enough already. 20 Don't answer that question. I instruct the 21 witness not to answer. This is preposterous, a waste of 22 time, insulting. Get on to the issues that matter in 23 this case, rather than, "How do you feel about 1991?" 24 Please, Counsel. Please. 25 MR. ROSENBLATT: This has a tendency to lead to	Page 85 1 relevant -- 2 MR. DEIXLER: This has the tendency to lead to 3 nothing. You're wasting time. You're trying to impose 4 your force upon Mr. Rose. 5 MR. ROSENBLATT: That's not true. 6 MR. DEIXLER: Knock it off. 7 MR. ROSENBLATT: That's not true. 8 MR. DEIXLER: He's been instructed. 9 MR. ROSENBLATT: He's been instructed not to 10 answer? 11 MR. DEIXLER: Correct. 12 BY MR. ROSENBLATT: 13 Q. Do you know that if you copy someone else's 14 photograph that you don't own, that could constitute 15 copyright infringement? 16 MR. GUTMAN: Objection. Legal conclusion. 17 Foundation. 18 THE WITNESS: Possibly. 19 BY MR. ROSENBLATT: 20 Q. When did you first become aware of 21 copyright -- photographic copyright infringement? 22 A. I have no idea. Perhaps '85. 23 Q. Did Geffen Records ever send a photographer to 24 take photographs of you? 25 A. No, they never sent anyone. There are times

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Page 86 1 when they sent us to photographers. 2 Q. Have you ever been to Louisiana? 3 A. Yes. 4 Q. Do you know Alan Niven? 5 A. Unfortunately. 6 Q. Tell me how you know him. 7 A. He was our manager from somewhere in '86 to 8 somewhere in 1990, I believe. Maybe early '91. 9 Q. Would you say it's your practice and pattern 10 of Guns N' Roses to control the photographic images of 11 the band to the maximum degree possible? 12 MR. GUTMAN: Objection. Misstates, 13 mischaracterizes the evidence. Argumentative. 14 THE WITNESS: In the sense of maximum degree, 15 there's not a lot you can do with camera phones and what 16 media chooses to do anymore. So I would say yes, but 17 you're limited. 18 BY MR. ROSENBLATT: 19 Q. Have any of the plaintiffs in this case 20 registered any photographic copyrights on your behalf? 21 A. I do not know. 22 Q. In 2017, did you falsely claim to own a 23 photograph that you didn't own? 24 MR. GUTMAN: Objection. Argumentative. 25 THE WITNESS: Doubtful.	Page 87 1 BY MR. ROSENBLATT: 2 Q. Was there a news story on CBS News about you 3 falsely claiming to own a photograph you didn't own? 4 A. I do not know anything about that. 5 Q. Do you know who would? 6 A. No. 7 Q. Who's Sabrina Okimoto? 8 A. A friend of mine. 9 Q. Is she a masseuse? 10 A. She was a masseuse several years ago. 11 Q. What happened? 12 A. Carpal tunnel syndrome. 13 Q. Are you aware that Fernando Lebeis told Kat 14 Benzova that -- he said, "We own the photographs you 15 take," in reference to Guns N' Roses? 16 A. I would imagine so. 17 Q. You authorized him to say that? 18 A. Yes, he's authorized to say that. 19 Q. Would it surprise you to find out that you're 20 not the owner of any of the photographs? 21 MR. GUTMAN: Objection. Foundation. 22 Argumentative. Asked and answered five times now. 23 THE WITNESS: It seems to be you're saying that's 24 someone's opinion. I'm not aware of that. 25 ///
Page 88 1 BY MR. ROSENBLATT: 2 Q. Do you think ownership is a matter of opinion? 3 MR. GUTMAN: Objection. Argumentative. 4 THE WITNESS: If that's how you look at it, I 5 guess. 6 BY MR. ROSENBLATT: 7 Q. So it's your testimony that ownership could be 8 a matter of opinion? 9 MR. GUTMAN: Objection. Argumentative. Asked and 10 answered. 11 THE WITNESS: There's -- 12 MR. GUTMAN: Just let me finish the objection for 13 the record. It's just he's repeating the same question 14 and answer in a new question. It's harassing and 15 argumentative. 16 THE WITNESS: It's why people contest things in a 17 court of law. 18 BY MR. ROSENBLATT: 19 Q. Because it's an opinion? 20 A. Well, there's different opinions about what 21 the constitution says, and that's why we're in a big 22 mess right now in this country. 23 Q. Ownership is a matter of interpretation? 24 A. It can be. 25 MR. GUTMAN: Objection. Argumentative. Asked and	Page 89 1 answered. 2 THE WITNESS: Or a court could say that it's not. 3 I don't know. 4 BY MR. ROSENBLATT: 5 Q. So, tell me if I'm wrong. You first became 6 aware of photographic copyrights and how they work in 7 and around 1985? 8 MR. GUTMAN: Objection. Asked and answered. 9 MR. ROSENBLATT: I'm trying to clarify. I didn't 10 remember. 11 MR. DEIXLER: You should buy a transcript. Buy a 12 transcript, and you'll be able to refresh your memory, 13 Counsel. 14 MR. BJORGUM: Come on. You guys are -- 15 MR. DEIXLER: You're harassing this witness. 16 MR. BJORGUM: You guys are double-teaming him. 17 Come on, now. 18 MR. DEIXLER: You're harassing this witness, asking 19 him repetitive questions that you know the answer to -- 20 MR. BJORGUM: You know this is not -- 21 MR. DEIXLER: -- he's already testified -- 22 MR. BJORGUM: You know this is not -- 23 MR. DEIXLER: Stop talking. 24 MR. BJORGUM: -- even close to harassment. 25 MR. DEIXLER: Stop talking.

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Page 90 1 MR. BJORGUM: You stop talking. 2 MR. DEIXLER: Stop talking. 3 MR. BJORGUM: No. Why don't you object and -- 4 MR. DEIXLER: Don't tell us what to do. Stop 5 talking. 6 MR. BJORGUM: Do it normally. 7 MR. DEIXLER: Stop talking. 8 MR. BJORGUM: You know how this works. 9 BY MR. ROSENBLATT: 10 Q. Do you know what Lumen is? 11 A. I'm not sure. 12 Q. Was there ever -- and I don't say this to 13 embarrass you or harass you. I really don't. 14 Was there ever an unbecoming photo of you in 15 2017 that went viral, that you sought to take down? 16 A. I do not recall. 17 Q. Would it surprise you to hear that there's 18 public records that document people acting on your 19 behalf, trying to take it down? 20 MR. GUTMAN: Objection. Speculation. 21 THE WITNESS: No. No, not at all. 22 BY MR. ROSENBLATT: 23 Q. Did you authorize that? 24 A. Well, in general, my people, my team, are 25 authorized to pull or attempt to pull through legal	Page 91 1 channels whatever they don't feel is in my best interest 2 or could be some violation of my rights or something. 3 I'm not aware of this. I'm assuming this is about the 4 CBS thing. I've never heard of this before in my life. 5 Q. How do you verify that you're the owner of 6 photographic copyrights? 7 A. That would be through Doug Mark. 8 Q. And do you know how he does, or you don't 9 know? 10 MR. DEIXLER: Privileged. Don't ask anymore 11 privileged questions, Counsel. That's your second and 12 last warning. 13 MR. GUTMAN: And Mr. Rosenblatt, since you're the 14 one who selected the space, do you think you could do 15 something about all the noise in the room outside here? 16 Do you think you could request that the people keep 17 their voices down? I don't think shutting the door. 18 It's coming through the wall. 19 MR. ROSENBLATT: Alan, I didn't know you were gonna 20 bring this many people. You never notified me before. 21 MR. GUTMAN: Well, even if there was just one 22 person in the room, the noise next door is the noise 23 next door. 24 MR. ROSENBLATT: I think they were putting on a 25 show, but it's okay.
Page 92 1 MR. GUTMAN: I'm sorry, are you trying to make 2 some -- 3 MR. ROSENBLATT: No, Alan. 4 MR. GUTMAN: -- some witty comment that's -- 5 MR. ROSENBLATT: No, Alan. 6 MR. GUTMAN: -- supposed to insult me? I'm trying 7 to act civilly and professionally, and you seem to 8 reject that -- 9 MR. ROSENBLATT: No. 10 MR. GUTMAN: -- opportunity to reciprocate on that 11 level. 12 MR. ROSENBLATT: We have the same intention, 13 Mr. Gutman. 14 MR. GUTMAN: I don't think so. 15 BY MR. ROSENBLATT: 16 Q. Did you know that Katarina Benzova's first 17 language is not English? 18 A. No, I do not know what language or languages 19 she may have learned from birth. 20 Q. How did you meet her? 21 A. Our guitarist Ron Thal Bumblefoot and another 22 guitarist, I believe DJ Ashba, introduced me to her at a 23 bar or a hotel in Prague that was like a natural 24 underground cavern and showed me photographs that she 25 had taken on her phone at our show in Prague, and that's	Page 93 1 how I met Kat. 2 Q. You just got along at first? 3 MR. DEIXLER: I'm sorry, I didn't hear the 4 question. Could you please... 5 BY MR. ROSENBLATT: 6 Q. Did you get along? 7 A. In a sense of, "Hi, hey, these photos are 8 cool, great," yes. 9 Q. And for most of the time that you guys worked 10 together, you thought that she did quality work? 11 A. Yes. 12 Q. What did you think was good about the work? 13 A. Well, that's subjective, and I want to say 14 that in the sense of Doc McGhee had no respect for her 15 photos when he managed us and thought it was just 16 somebody that could point their phone. The photos I 17 saw, I liked the way the other guys looked, I liked the 18 way I looked. I thought she was getting the right 19 angles and the right photos of them that -- at least the 20 ones that I saw at the time, which is very minimal. But 21 that said, everyone in the lineup at that time seemed to 22 be happy with her work and dealing with her about their 23 photos. 24 Q. Have you ever been in a copyright litigation 25 with a photographer that's not Katarina Benzova?

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Page 94 1 A. Possibly. 2 Q. You mentioned Doc McGhee. 3 Do you think Fernando Lebeis had respect for 4 Ms. Benzova's photographs? 5 A. Yes. 6 Q. How so? 7 A. He did not voice any issues with them, and he 8 didn't voice -- yeah, he didn't voice any issues with 9 her work. 10 Q. Until the end? Or he never did? 11 A. Yes, until our last -- whatever her last batch 12 of work was with us is all I'm aware of that my team 13 wasn't truly happy with. But as I said, I don't like to 14 look at the stuff in general anyway. 15 Q. Did they tell you the reason that they were 16 unhappy with it? 17 A. Just that it wasn't at the level that it had 18 been. And I do remember -- I recall something about her 19 possibly -- it was my understanding, of using filters 20 and things on some of the other guys, and they weren't 21 happy with how their images were edited or something. 22 Q. Slash wasn't happy? 23 A. I believe both Slash and Duff, but I think 24 primarily Slash. 25 Q. And they voiced this to you?	Page 95 1 A. Not to me, no. 2 Q. Who did they voice it to? 3 A. I would imagine -- I can only speculate that 4 it would be Fernando and/or Beta. 5 Q. So how were you informed of this? 6 A. Talking with Beta about Kat, in our decision 7 to -- to not do our Asian/Australian tour with Kat at 8 the time, until she had hopefully sorted out whatever 9 was going on with her health and her mental health. 10 Q. So it wasn't budgetary concerns? That's not 11 why you released her? It was because of deteriorating 12 quality in her photographs? That's what your testimony 13 is? 14 A. That she was let go then? 15 Q. For budgetary reasons? 16 A. No, no, no. No, it wasn't budgetary reasons. 17 It was -- well, it depends. There was -- it was my 18 understanding that she wanted to be flown back and forth 19 from Asia and Australia to New York for therapy during 20 the tour and for us to pay for the therapy. And that 21 did not seem like our responsibility. 22 Q. And who informed you of that? 23 A. Beta Lebeis. 24 Q. And how did she inform you of that? 25 A. Talking.
Page 96 1 Q. "Talking." Did she ever text you about it? 2 A. No. 3 Q. Ever e-mail you about it? 4 A. No. 5 Q. Do you remember where you were when you were 6 informed? 7 A. Not specifically. I would think Malibu. 8 Q. Latigo? 9 A. Yes. 10 Q. You own that property? 11 A. Yes. 12 Q. How long have you owned that property? 13 MR. GUTMAN: Objection. Relevance. Not reasonably 14 calculated to lead to the discovery of admissible 15 evidence. Harassing. 16 MR. DEIXLER: Invades the witness's privacy. He's 17 not gonna answer any questions about his personal 18 residence. It has absolutely nothing to do with this 19 case, and it is dangerous in the year in which we now 20 live. Full stop. 21 THE WITNESS: I don't get to give my crib props? 22 BY MR. ROSENBLATT: 23 Q. How do you promote your concerts? 24 A. Generally through Live Nation. 25 Q. What do they do?	Page 97 1 A. I think it varies. They run ads in different 2 forms of media and put tickets on sale through whatever 3 the ticket vendors are. 4 Q. What do you mean various forms of media? 5 A. Internet sites, radio -- traditional radio, 6 satellite radio -- possibly magazines, newspapers, 7 billboards, type of things like that. Industry 8 publications. 9 Q. Have you ever used a Benzova photograph for a 10 billboard? 11 MR. GUTMAN: You're saying him, or you're asking 12 about Live Nation? 13 BY MR. ROSENBLATT: 14 Q. Has Live Nation? 15 MR. GUTMAN: Objection. Foundation. 16 THE WITNESS: I do not know specifically, no. 17 BY MR. ROSENBLATT: 18 Q. Have you ever seen a billboard with a photo 19 taken by Katarina Benzova of Guns N' Roses? 20 A. I do not know. Yeah, I do not know. 21 Q. Have you ever seen a magazine with a picture 22 taken by -- 23 A. I do not look at them. 24 MR. GUTMAN: Make sure he asks the whole question, 25 because --

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Page 98 1 THE WITNESS: Okay. 2 MR. GUTMAN: -- it's not going to translate -- 3 THE WITNESS: Okay. 4 MR. GUTMAN: -- in the transcript. 5 BY MR. ROSENBLATT: 6 Q. Do you have a contract with Live Nation that 7 authorizes them to promote your concerts on your behalf? 8 MR. GUTMAN: Objection. Foundation. 9 THE WITNESS: I would think so. 10 BY MR. ROSENBLATT: 11 Q. You don't know? 12 A. I would say that 99.9 percent I'm sure we do, 13 but I do not know specifically. 14 Q. Have you or any of your agents ever 15 represented to Live Nation that they own the photographs 16 that were taken by Katarina Benzova? 17 MR. GUTMAN: Objection. Foundation. 18 THE WITNESS: Live Nation doesn't own any 19 photographs by Kat Benzova that I know of. 20 BY MR. ROSENBLATT: 21 Q. Did you or any of your agents ever represent 22 to Live Nation that Guns N' Roses -- you or any of your 23 entities -- own the photographs that you gave to Live 24 Nation? 25 A. I don't know.	Page 99 1 MR. GUTMAN: Objection. Foundation. 2 THE WITNESS: I don't know. 3 BY MR. ROSENBLATT: 4 Q. How did Live Nation get photographs that they 5 could use in magazines or billboards or Internet sites? 6 MR. GUTMAN: Objection. Foundation. 7 THE WITNESS: I would think that we sent them 8 through our management, but I do not know. 9 BY MR. ROSENBLATT: 10 Q. Through Fernando? 11 A. Yeah, through Fernando, through Team Brazil. 12 Q. Through Beta? 13 A. That, I do not know. 14 Q. Through Vanessa? 15 A. That, I do not know. I mean, if Vanessa was 16 dealing with that, then that was -- that would be 17 secondary or tertiary to management already having -- 18 being the one dealing with that. 19 Q. Would you say you have a financial interest in 20 how Guns N' Roses is promoted? 21 A. Yes. 22 Q. So would you say you have a financial interest 23 in which photographs are used to promote Guns N' Roses 24 concerts? 25 MR. GUTMAN: Objection. Foundation. Speculation.
Page 100 1 THE WITNESS: Yes. 2 BY MR. ROSENBLATT: 3 Q. When you're on tour, is there ever any sexual 4 harassment training for your crew? 5 A. I'm not aware of any, no. 6 Q. Do you or any of the entities that you're in 7 charge of have a sexual harassment handbook? 8 A. I'm not aware of one, no. 9 Q. Who would know? 10 A. I don't know. I've never heard of such a 11 thing. 12 Q. You've never heard of what such a thing? 13 A. A sexual harassment handbook. Does it tell 14 you how to do it? 15 Q. You never heard like in general? Or in the 16 Guns N' Roses enterprise? 17 A. In general. 18 Q. In general. So you're not aware that certain 19 companies have procedures about how to handle sexual 20 harassment? 21 A. Correct. 22 Q. Did you ever think it was necessary to seek 23 that out? 24 A. No. 25 Q. Why do you think it was never necessary?	Page 101 1 A. I've never witnessed any sexual harassment in 2 Guns N' Roses ever. 3 MR. DEIXLER: Counsel, may I reiterate what 4 Mr. Gutman has said about trying to tamp down the noise 5 that's outside? Perhaps you could use your influence 6 with the proprietors here to ask them to kind of make 7 things quiet. 8 MR. ROSENBLATT: We're gonna go off the record. I 9 have to go, too, to the restroom. 10 Does anybody else need to go to the restroom? 11 THE REPORTER: I'll use a break. 12 THE VIDEOGRAPHER: We're going off the record. The 13 time is 12:55. 14 (Recess.) 15 THE VIDEOGRAPHER: We're back on the record. It's 16 1:15 p.m. 17 BY MR. ROSENBLATT: 18 Q. All right, Axl. Previously you said -- 19 MR. DEIXLER: I'm sorry, would you please refer to 20 him by his surname. 21 MR. ROSENBLATT: Sorry, I apologize. 22 MR. DEIXLER: Thank you. 23 BY MR. ROSENBLATT: 24 Q. Mr. Rose, previously you had stated that you 25 were unsure if you are the principal of Black Frog

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Page 102 1 Entities, Gundam Touring, Gundam Productions, Waterhead, 2 and Gundam Music; correct? 3 MR. GUTMAN: Objection. Misstates, 4 mischaracterizes prior testimony. That's an improper 5 form of question also. 6 THE WITNESS: In the sense of I'm not sure what the 7 specific names of all the different entities are at this 8 time. 9 BY MR. ROSENBLATT: 10 Q. Are you the chief executive officer of 11 Waterhead International, Inc.? 12 A. I believe so, yes. 13 Q. Are you the chief financial officer of 14 Waterhead International, Inc.? 15 A. See, I couldn't say that it's Waterhead 16 International. I've only called it "Waterhead" for a 17 long time personally, and no one refers to it when 18 they're talking to me, if they used the term 19 "Waterhead," which doesn't get used often to me. So I 20 wouldn't know that specific. And that's all I'm saying 21 about those names, that they sound familiar to me, that 22 Gundam. But Gundam what, I don't know. I mean, those 23 names get -- and sometimes the names get changed. 24 Q. But you're a part of all them, and they're 25 related to each other?	Page 103 1 A. Yes. 2 MR. GUTMAN: Objection. Compound. Foundation. 3 Vague and ambiguous. 4 MR. ROSENBLATT: Can we mark Exhibit 5 into the 5 record. 6 (Defendant's Exhibit 5 was marked.) 7 MR. DEIXLER: We're off the 100 series, and we're 8 back to the -- 9 MR. ROSENBLATT: Yes. 10 MR. DEIXLER: -- single digits? 11 MR. ROSENBLATT: Yes. 12 MR. GUTMAN: Actually, you've gotta give me a copy. 13 MR. DEIXLER: Give counsel a copy first before you 14 give it to the witness. 15 MR. ROSENBLATT: There's a mix-up here. I 16 apologize. Mark for the record Exhibit 2. 17 (Defendant's Exhibit 2 was marked.) 18 MR. DEIXLER: Has Exhibit 5 been looped? 19 MR. ROSENBLATT: Yeah. 20 Q. Did you read that? 21 A. I looked at it. 22 Q. Does it have your name on it? 23 MR. DEIXLER: What is the "that"? 24 MR. GUTMAN: You're giving the witness and you're 25 giving counsel two different documents. So which one do
Page 104 1 you want to work with? 2 MR. ROSENBLATT: How about you guys look at 3 Exhibit 5 first, because I accidentally went out of 4 order, and I'll do Exhibit 2 now. 5 MR. GUTMAN: Okay, but you don't have a copy of 6 Exhibit 5 for anyone? 7 MR. ROSENBLATT: Correct. I missed it. 8 MR. DEIXLER: So we should first have the document 9 marked by the court reporter so we have an official 10 record. 11 THE REPORTER: I wrote 5 on there. 12 MR. DEIXLER: Now you're gonna give it to the 13 witness. Okay. 14 THE WITNESS: What am I looking for? 15 MR. ROSENBLATT: Your name and the address, the 16 mailing address. 17 THE WITNESS: Yes. 18 BY MR. ROSENBLATT: 19 Q. What's the mailing address? 20 MR. GUTMAN: You want him to read it to himself or 21 out loud? 22 MR. ROSENBLATT: Out loud, please. 23 MR. GUTMAN: I'm gonna object to that as 24 harassment. 25 THE WITNESS: 5950 Canoga Avenue, Suite 510,	Page 105 1 Woodland Hills, California 91367. 2 MR. ROSENBLATT: Thank you. All right, Exhibit 2 3 in the record. 4 MR. DEIXLER: Has that been provided to the court 5 reporter? 6 BY MR. ROSENBLATT: 7 Q. Will you read the manager and the member 8 names. 9 A. On the one that you just handed me? 10 Q. Yes. 11 MR. GUTMAN: You can just read it to yourself. 12 BY MR. ROSENBLATT: 13 Q. Please read it for the record. 14 MR. GUTMAN: You can just read it to yourself. 15 You know what, the document speaks for itself. 16 You're harassing the witness. This is a complete and 17 utter waste of time, completely unprofessional. There's 18 absolutely no way that this is permissible in any other 19 circumstance. 20 MR. ROSENBLATT: Are you instructing him not to 21 answer? 22 MR. GUTMAN: Yes. On this question, yes. I will 23 stand on this objection. Stop harassing the witness, 24 please. 25 MR. ROSENBLATT: For the record, all we're doing is

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Page 106 1 demonstrating that Axl Rose is a managing member of 2 Gundam Touring, LLC, and a managing member of Waterhead 3 International. Formerly, his testimony, he said he 4 wasn't aware, and we're just bringing documents forth so 5 he can ascertain that fact. 6 MR. GUTMAN: Actually, you're misstating and 7 misrepresenting what he testified to. The document 8 you're using to ostensibly refresh his recollection, you 9 can introduce this in a variety of other ways if you 10 know how, but to have him, just to harass him, by asking 11 him to read stuff on a document out loud, he doesn't 12 need to read it out loud. 13 Read it to yourself. 14 MR. BJORGUM: Was that an objection? 15 MR. ROSENBLATT: Is that an objection? Are you 16 instructing him to not -- 17 MR. DEIXLER: Are you speaking again? Please -- 18 MR. BJORGUM: Yeah, I am. 19 MR. DEIXLER: -- please stop talking. There's 20 nothing to say. 21 MR. BJORGUM: Really? 22 MR. DEIXLER: Yeah. 23 MR. ROSENBLATT: There's no real reason for 24 anything -- 25 MR. BJORGUM: I'm saying more than him by one word.	Page 107 1 MR. ROSENBLATT: Please, please. There's no reason 2 for anything to be heated. 3 Q. Can you see, Mr. Rose, that -- the mailing 4 address and that you are involved with these companies 5 through the Secretary of State's records? 6 A. If that's -- 7 MR. GUTMAN: Objection. It's compound. 8 THE WITNESS: I don't know if this is even real. I 9 don't know what this is. But I would say I see that on 10 this piece of paper, whatever it is. 11 BY MR. ROSENBLATT: 12 Q. Okay. So you can know now that you are the 13 principal of Gundam Touring Services and Gundam 14 Productions? 15 MR. GUTMAN: Objection. Foundation. Vague and 16 ambiguous as to "principal." 17 THE WITNESS: I would believe so. 18 MR. ROSENBLATT: For the record, we are suing under 19 the single-enterprise theory in this case. So it's not 20 irrelevant. 21 MR. GUTMAN: You don't have to respond. He's just 22 making an argument. 23 BY MR. ROSENBLATT: 24 Q. So who handles the day-to-day operations for 25 Gundam Touring, LLC?
Page 108 1 MR. GUTMAN: Objection. Assumes a fact. 2 THE WITNESS: The person that would oversee that I 3 believe would be Fernando Lebeis. Depending on what 4 aspect of it is, he would oversee it. It could be 5 Bernie Gilhuly. I do not know. 6 BY MR. ROSENBLATT: 7 Q. What are the aspects? 8 A. I don't know. I don't know what Gundam 9 exactly covers. I would have to refresh myself on that, 10 on the specifics. 11 Q. Do these entities, Gundam Touring Services, 12 Gundam Productions, Waterhead International, do they 13 maintain separate books and records? 14 A. I do not know. 15 MR. GUTMAN: Objection. Foundation. 16 THE WITNESS: I would think so. 17 BY MR. ROSENBLATT: 18 Q. Are they affiliated with Black Frog Entities? 19 MR. GUTMAN: Objection. Vague and ambiguous. 20 THE WITNESS: In the sense that they're affiliated 21 with Guns N' Roses, yes. 22 BY MR. ROSENBLATT: 23 Q. So they're related through Guns N' Roses? 24 A. Yes. 25 MR. GUTMAN: Objection. Mischaracterizes,	Page 109 1 misstates his testimony. Argumentative. Foundation. 2 BY MR. ROSENBLATT: 3 Q. Do these entities have separate bank accounts? 4 A. I do not know. 5 Q. Do these entities maintain separate offices or 6 facilities? 7 A. I don't believe so. 8 Q. Based on the records that you've just seen, 9 does it appear that they do? 10 MR. GUTMAN: Objection. Foundation. 11 THE WITNESS: It doesn't appear that way, no. 12 BY MR. ROSENBLATT: 13 Q. Does it appear that they have the same 14 principal place of business at 5950 Canoga Avenue? 15 MR. GUTMAN: Well, Exhibit 2 doesn't use that 16 address for the principal address. 17 THE WITNESS: Waterhead uses Latigo. 18 BY MR. ROSENBLATT: 19 Q. Your home address? 20 A. Well, actually, it's got two places, it's got 21 two addresses. It has the street address of "California 22 Office of Corporation" with the Latigo, but then 23 under -- with my name and Beta's name, it has the Canoga 24 Avenue address. So it has both. 25 Q. Okay. So are you the chief executive officer

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Page 110 1 of Black Frog Touring, Inc.? 2 MR. GUTMAN: Objection. No such entity. Misstates 3 the evidence. Foundation. 4 MR. ROSENBLATT: I'm not referring to that 5 document. 6 MR. GUTMAN: You said "Black Frog Touring." I 7 haven't heard of any such entity. 8 BY MR. ROSENBLATT: 9 Q. Does Black Frog Touring, Incorporated, exist? 10 A. I don't know. 11 Q. You don't know? 12 A. No. 13 Q. Do you know if you are the director of Black 14 Frog Touring, Inc.? 15 MR. GUTMAN: Assuming there is such an entity. 16 THE WITNESS: I do not know. 17 BY MR. ROSENBLATT: 18 Q. Were you aware that there are ongoing 19 ownership disputes between Fernando and Kat regarding 20 the photos in this lawsuit? 21 A. Well, I do not know which lawsuit this is, as 22 you told me that I am a plaintiff in this particular 23 lawsuit, but I don't know if that's a countersuit or 24 not. So I don't know. 25 MR. ROSENBLATT: Can I show him -- permission of	Page 111 1 counsel, can I show him this? 2 MR. DEIXLER: Sure. 3 BY MR. ROSENBLATT: 4 Q. Just the cover page. Will you read the 5 plaintiffs section. 6 MR. GUTMAN: Hold on one second. 7 MR. DEIXLER: I'll authenticate for the record. 8 Before the witness now is a document which is 9 described as the -- complaint? 10 MR. ROSENBLATT: As the counterclaim, yeah. 11 MR. DEIXLER: As the counterclaim in the case. 12 There needs to be a record of what you put 13 before a witness. That's why the court reporter is 14 here. 15 MR. ROSENBLATT: Do we have permission, sir? 16 MR. DEIXLER: Do you have permission, sir, to do 17 what? 18 MR. ROSENBLATT: To show him the cover page. 19 MR. DEIXLER: Yes. I am just trying to help you. 20 You know, I've taught deposition practice for many 21 years, and perhaps you would like to take the course. 22 I'm just trying to authenticate for the record so that 23 there is a record of what you've put before the witness. 24 That's the purpose of having a court reporter and 25 showing a document and marking exhibits.
Page 112 1 MR. ROSENBLATT: Thank you for your input. 2 MR. GUTMAN: I'll just indicate for the record what 3 appears to be a first amended counterclaim. Oddly, it 4 does not have the court stamp legend on it. So there's 5 no way to even determine if it is a -- the same as a 6 copy that would have been filed with the court. 7 MR. BJORGUM: It's just for identification. 8 THE WITNESS: And what was the question again, 9 please? 10 MR. GUTMAN: What do you want him to look at? Or 11 do you want him to read whole thing out loud? 12 MR. ROSENBLATT: No, he said he wasn't aware of 13 what the lawsuit is. So I just want him to know who the 14 plaintiffs are. 15 Q. If you can just look at the cover page, and 16 under "plaintiffs." 17 A. I'm looking for the word "plaintiffs." 18 Oh, okay, all right, yeah, yeah, "plaintiff." 19 Okay, I see it. 20 MR. GUTMAN: And then defendant, counter-claimant, 21 and then third-party defendants. 22 THE WITNESS: Okay, I see it. Yes. 23 MR. ROSENBLATT: So the plaintiffs initiated the 24 lawsuit. 25 THE WITNESS: Yes, that's the counterclaim, is my	Page 113 1 understanding. 2 BY MR. ROSENBLATT: 3 Q. Okay. So were you aware that Fernando and 4 Katarina Benzova had ongoing disputes about ownership 5 over the photographs? 6 MR. GUTMAN: I thought we just asked and answered 7 that about two minutes ago. 8 THE WITNESS: As of when? 9 MR. ROSENBLATT: Since 2016. 10 THE WITNESS: No, I'm not aware of that. 11 BY MR. ROSENBLATT: 12 Q. It was never brought to your attention? 13 A. No. 14 Q. Were you aware that there are ongoing disputes 15 between Fernando Lebeis and Katarina Benzova regarding 16 photo attribution? 17 A. "Attribution," will you explain that? 18 Q. Photo credit. 19 A. Photo credit. No, I'm not aware of that. 20 Q. Nothing? Fernando never told you? 21 A. That there were issues about photo credits? 22 No. 23 Q. Are you aware that Fernando informed Katarina 24 Benzova that she was not permitted to exploit the 25 photographs that she took with Guns N' Roses?

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Page 114 1 A. Yes. 2 Q. Do you agree with that? 3 A. Absolutely. 4 Q. Tell me why, please. 5 A. As we own them, and it was our decision where 6 they were used. 7 Q. And you stand by that it is your decision only 8 about where the photos could go? 9 MR. GUTMAN: Objection. Misstates, 10 mischaracterizes his testimony. 11 THE WITNESS: I would say that Slash and Duff can 12 and do decide where their photos go, and we've never had 13 an issue between ourselves about that. So it's just not 14 something I have to really think about in that regard. 15 If I did have an issue, I'd text him or call him or 16 something and talk about it, go from there. 17 BY MR. ROSENBLATT: 18 Q. Between... 19 A. Slash or Duff. 20 Q. But never Kat? 21 A. Me directly, no. 22 MR. DEIXLER: We need to have the question read, 23 please. 24 (Last question read.) 25 MR. DEIXLER: Okay, I don't think that's a	Page 115 1 question. Could you pose perhaps a slightly more 2 articulate question, Counsel? 3 BY MR. ROSENBLATT: 4 Q. Were you aware of the ongoing disputes 5 regarding that Kat wasn't permitted to exploit her own 6 photographs? 7 MR. GUTMAN: Objection. Foundation. Assumes 8 facts. 9 THE WITNESS: As of when? 10 MR. ROSENBLATT: 2016. 11 THE WITNESS: No. 12 BY MR. ROSENBLATT: 13 Q. You just stated that you agree with her not 14 being able to exploit the photographs that she took with 15 Guns N' Roses? 16 A. Yes. 17 MR. GUTMAN: Objection as to form. Improper to ask 18 a witness what he just said. Asked and answered. 19 THE WITNESS: And any use of our photos would go 20 through us. 21 MR. ROSENBLATT: "Any." 22 MR. DEIXLER: Please don't repeat the witness's 23 answers. Just ask questions. 24 BY MR. ROSENBLATT: 25 Q. And that is required, in your mind?
Page 116 1 MR. GUTMAN: I'm sorry, what is the predicate, 2 "that"? 3 MR. DEIXLER: Could you read the pending question, 4 please. 5 MR. ROSENBLATT: Axl Rose just stated -- 6 MR. DEIXLER: No, she's reading a pending question, 7 Counsel. 8 (Last question read.) 9 MR. DEIXLER: That's not a question. 10 MR. ROSENBLATT: I believe Mr. Rose said any use of 11 the photographs must "go through us." 12 MR. GUTMAN: You're asking him if your recollection 13 of his statement is correct? 14 BY MR. ROSENBLATT: 15 Q. Did you say that? 16 A. I believe so. I think there would be a record 17 of it. 18 Q. Were you aware that there is ongoing disputes 19 regarding revenue-sharing regarding DVDs? 20 A. I was not aware of anything to do with any 21 DVDs. 22 Q. Were you aware that there was ongoing disputes 23 between Fernando Lebeis and Kat Benzova regarding 24 revenue-sharing of photo books? 25 A. What photo books?	Page 117 1 Q. Yes or no? 2 A. No idea. 3 Q. "No idea." 4 MR. DEIXLER: Please don't repeat his answers. 5 THE WITNESS: I'm not aware of a photo book. 6 BY MR. ROSENBLATT: 7 Q. In 2017, were you aware of any potential 8 project about a photo book using photographs of Guns N' 9 Roses? 10 A. Okay, this is like a -- like a two-parter. 11 The only photo book that I'm aware of there 12 was talk of were with the previous lineups to Slash and 13 Duff and I getting back together. I'm not aware of any 14 plans or anything regarding a photo book once Slash and 15 Duff and I had begun performing together in 2016. 16 Q. Are you denying the existence of a Guns N' 17 Roses photo book in 2018? 18 MR. GUTMAN: He's not denying anything. He just 19 gave you his testimony he's not aware of it. So you 20 don't have to argue with the witness. He just answered 21 you. 22 MR. ROSENBLATT: I think he's coaching -- put on 23 the record that Alan Gutman is coaching the witness. 24 MR. GUTMAN: How about put it on the record that 25 you're acting unprofessionally and you're harassing the

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Page 118 1 witness, all right? Ask a question in a proper form and 2 move on. 3 MR. ROSENBLATT: For the record, I'm acting 4 politely and calmly, and there's no harassment 5 whatsoever. 6 MR. DEIXLER: See, I dissent from that. 7 THE WITNESS: I would say that the other attorney 8 is giving his opinion, like I just did. 9 BY MR. ROSENBLATT: 10 Q. Right. So, do you know the difference between 11 likeness and copyright ownership? 12 A. No. 13 Q. "No." 14 A. But I could get an opinion. 15 Q. In October 2022, did you or anyone on your 16 behalf offer Ms. Benzova \$8,000 to assign her copyrights 17 to Guns N' Roses? 18 A. I'm not aware of anything like that. 19 Q. Did you know that Fernando Lebeis stated that 20 the document where the offer for \$8,000 to Ms. Benzova 21 was partnership approved? 22 A. I'm not aware of anything that you're talking 23 about. 24 Q. In that document, it asks Ms. Benzova to agree 25 that she work continuously from 2021 to October 2022.	Page 119 1 Did Ms. Benzova work for Guns N' Roses 2 continuously from October 2021 to October 2022? 3 A. I don't recall when the last time that we 4 worked with Kat actually was. 5 Q. Has she ever worked for you for 13 months 6 straight? 7 A. Well, in my view or understanding, Kat worked 8 with us up until -- she didn't -- from when she started 9 till when she didn't. I'm not aware of any time that 10 she wasn't in some way -- I don't know what the legal 11 terms of it were, but she was considered part of working 12 with us. 13 Q. Do you think receiving photo credit is 14 important for a professional photographer? 15 MR. GUTMAN: Objection. Speculation. Foundation. 16 Incomplete hypothetical. 17 THE WITNESS: As I said, I do not know anything 18 about our arrangement on photo credits. 19 BY MR. ROSENBLATT: 20 Q. Are you familiar -- 21 A. And I didn't know there was an issue. 22 Q. Are you familiar that the GNR logo appears on 23 many of the photographs taken by Katarina Benzova? 24 A. As I said, I don't look at them. So I'm not 25 aware of seeing the actual logo on it. I mean, I see
Page 120 1 this, but I don't know if that's what you mean. 2 MR. DEIXLER: Indicating Exhibit... 3 THE REPORTER: 102. 4 MR. DEIXLER: 102. 5 BY MR. ROSENBLATT: 6 Q. Who decides to affix the GNR logo onto 7 photographs? 8 A. No idea. 9 Q. Would it be Vanessa? 10 A. No idea. 11 Q. Would it be Fernando Lebeis? 12 A. No idea. 13 Q. Does he have the authority? Did you grant him 14 that authority? 15 A. Yes, he would have that authority. 16 Q. You granted him that authority? 17 MR. DEIXLER: I'm sorry, you kind of mumbled the 18 question. Could you ask it again, or perhaps you could 19 have it re-read. 20 BY MR. ROSENBLATT: 21 Q. Did you grant Fernando Lebeis the authority to 22 affix the GNR photograph onto photographs taken by 23 Katarina Benzova? 24 A. He would have that authority, yes. 25 Q. What's the purpose of putting the GNR logo	Page 121 1 onto a photograph? 2 A. I have no idea. 3 Q. So then why would you do it? 4 MR. GUTMAN: Objection -- 5 THE WITNESS: I have no idea. 6 MR. GUTMAN: Objection. Foundation. 7 Argumentative. 8 And doesn't this relate to your now abandoned 9 copyright information management claim that the court 10 dismissed? 11 MR. ROSENBLATT: No. 12 MR. GUTMAN: Okay. He's answered the question. 13 BY MR. ROSENBLATT: 14 Q. Do you think a logo indicates ownership? 15 MR. GUTMAN: Objection. Speculation. Foundation. 16 Also calls for a legal conclusion. 17 THE WITNESS: Possibly. 18 BY MR. ROSENBLATT: 19 Q. Who's Jarmo -- and if I pronounce it 20 incorrectly -- 21 A. That's okay. 22 Q. Jarmo "Luukkonen"? 23 A. You know what, I just call him Jarmo, so... 24 Q. Is it okay if I call him Jarmo for the 25 purposes --

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Page 122 1 A. Yes. 2 Q. -- of this deposition? 3 A. Yes. I think it's "Luukkonen." 4 Q. Who is he? 5 A. He's an individual with a Guns N' Roses 6 website called heretodaygonetohell.com, and he is a 7 member of our crew, and he sometimes photographs and 8 videos. 9 Q. Does he own the photographs? 10 A. I don't believe so. 11 Q. Does he own the videos? 12 A. I do not believe so. 13 Q. Does he have the right to put those photos and 14 videos on his website? 15 What was the name of the website again, for 16 the record? 17 A. I don't know what our exact agreements are 18 with Jarmo specifically. 19 Q. Do you have a written agreement with Jarmo? 20 A. I do not know. 21 Q. Who would know? 22 MR. GUTMAN: Objection. Foundation. Speculation. 23 THE WITNESS: Doug Mark and possibly management, 24 Fernando. 25 ///	Page 123 1 BY MR. ROSENBLATT: 2 Q. Was Jarmo given photo credit? 3 A. I do not know. 4 Q. Were any of his photos used in merchandise? 5 A. I do not know. 6 Q. Was he allowed to post his photographs to his 7 own social media and website? 8 A. I do not know. 9 Q. Who would know? 10 MR. GUTMAN: Objection. Foundation. Speculation. 11 THE WITNESS: I would say Doug Mark and Fernando 12 Lebeis, and possibly Beta Lebeis. 13 BY MR. ROSENBLATT: 14 Q. And Jarmo is a male; correct? 15 A. Yes. 16 Q. Where's he from? 17 A. Finland. 18 Q. How much revenue did the 2016/2017 Not in This 19 Lifetime... Tour generate? 20 MR. GUTMAN: Objection. Foundation and privacy. 21 Instruct the witness not to answer. 22 BY MR. ROSENBLATT: 23 Q. How much revenue did the 2021/2022 tour 24 generate? 25 MR. GUTMAN: Same objections. Foundation and
Page 124 1 privacy. 2 Instruct the witness not to answer. 3 BY MR. ROSENBLATT: 4 Q. How much revenue was generated on the Guns N' 5 Roses website from 2016 to 2017? 6 MR. GUTMAN: Objection. Foundation, privacy. 7 Instruct the witness not to answer. 8 BY MR. ROSENBLATT: 9 Q. Were Ms. Benzova's photographs used to promote 10 any of the tours in 2016 to 2017? 11 A. I do not know specifically. I would imagine 12 so. 13 Q. Were her photographs used to promote the tour 14 in 2021 to 2022? 15 A. It's possible, yes. 16 Q. What's the price -- 17 Did you publicly sell tickets on 18 gunsnroses.com? 19 A. I do not know. 20 Q. How much does a subscription service to 21 Nightrain on gunsnroses.com cost? 22 A. I don't know. 23 Q. Are any photos taken by Katarina Benzova used 24 on Nightrain? 25 A. I do not know.	Page 125 1 Q. Did you use a photograph taken by Katarina 2 Benzova on a sweater that was sold on gunsnroses.com? 3 A. It's possible. I -- I don't know. I think we 4 had a sweater at some point, but I can't recall what it 5 looked like. I don't recall a photo on a sweater. So I 6 do not know. I think we did some ugly Christmas 7 sweaters, but I don't remember photos on those. 8 MR. GUTMAN: I think he's looking for a picture of 9 the sweater. I may order it. 10 MR. DEIXLER: I think he's looking for a sweater. 11 THE WITNESS: I wore a sweater today. 12 BY MR. ROSENBLATT: 13 Q. Are you still selling the sweater? 14 A. Am I still what? 15 Q. Selling the sweater on gunsnroses.com. 16 A. How much do you want to pay? 17 MR. GUTMAN: The sweater he doesn't know about? 18 THE WITNESS: We can start, start negotiating for 19 the sweater. 20 MR. GUTMAN: Oh, nice. What size is it? 21 MR. DEIXLER: Wow, XL. 22 MR. GUTMAN: So you brought some for everyone? 23 MR. ROSENBLATT: I think it might fit you, Alan. 24 I'm not sure. 25 MR. GUTMAN: How are you going to attach this to

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Page 126 1 the record, is what I want to know. 2 MR. BJORGUM: The old-fashioned way. 3 MR. ROSENBLATT: Do you have permission for him to 4 hold that up to the video? 5 MR. GUTMAN: Sure. Can we open it up? 6 MR. ROSENBLATT: No. 7 Q. Can you turn it around. 8 Do you think that's you? 9 A. I think so. 10 Q. Do you think that's based on a photo? 11 A. It could be, yes. Because it's very 12 pixelated, so I don't know. 13 Q. So who produced that sweater? 14 A. No clue. Bravado, maybe. Or maybe they had 15 someone make it. 16 Q. You're not sure, but you didn't produce it; 17 someone else did? 18 A. Yes. 19 Q. Some other third party produced that sweater? 20 MR. DEIXLER: He doesn't want you opening the bag. 21 He wants to keep it inviolate. 22 THE WITNESS: Is Bravado a third party or a second 23 party? 24 MR. ROSENBLATT: Third party. 25 THE WITNESS: Okay, so that would be third party	Page 127 1 then, yes, as far as I know. 2 BY MR. ROSENBLATT: 3 Q. Are you currently selling that sweater on 4 gunsnroses.com? 5 MR. GUTMAN: Asked and answered. 6 THE WITNESS: I don't know. I know that we have 7 sold sweaters, and they generally, to my understanding, 8 sell out fairly quickly. So that's all I know. And I 9 don't know how many we sold. 10 BY MR. ROSENBLATT: 11 Q. Would you supply us that information once you 12 find out? 13 MR. GUTMAN: I'm sorry, I couldn't hear you. 14 BY MR. ROSENBLATT: 15 Q. Would you supply us that information once you 16 find out? 17 MR. GUTMAN: No. 18 BY MR. ROSENBLATT: 19 Q. That photo -- there was a photograph taken and 20 owned by Katarina Benzova that was used to make that 21 sweater. 22 Did you get her explicit written permission to 23 create that sweater? 24 MR. GUTMAN: Objection to the condition predicate 25 in the question, which is an argument. No foundation.
Page 128 1 You can answer the question about did you get 2 her permission to use a photo on a sweater. 3 MR. ROSENBLATT: Can you repeat the question. I 4 think I said written permission. 5 (Last question read.) 6 MR. GUTMAN: Same objection. 7 You can just answer the question. 8 THE WITNESS: I did not know of Kat owning that 9 photo of me, and I would say that she does not own that 10 photo of me, or did not, and that no, we would not have 11 asked for her permission. 12 BY MR. ROSENBLATT: 13 Q. You did not get the written permission for 14 that use? 15 MR. GUTMAN: That's what he just said. 16 THE WITNESS: As it was deemed unnecessary. 17 BY MR. ROSENBLATT: 18 Q. How was that photo chosen to be used as a 19 sweater? 20 A. I don't know. Someone somewhere liked it, 21 maybe Bravado. It would be speculation. 22 Q. Did you profit off of that sweater? 23 A. Possibly. 24 Q. Did you share any of the revenue with 25 Ms. Benzova?	Page 129 1 A. I don't know. Not that I'm -- I don't know. 2 Q. Did Fernando ever tell you that he got written 3 permission from Kat to use that -- to use the photo in 4 that sweater? 5 MR. GUTMAN: Counselor, you were mumbling at the 6 beginning of the question. 7 Can I have the court reporter read back the 8 entire question. I don't know if it was a comment or 9 part of the question. 10 (Last question read.) 11 THE WITNESS: Never had a conversation about this 12 sweater in any way whatsoever. I've never seen the 13 sweater before or the design. I liked it. It wasn't as 14 ugly as the ugly ones. You know, there's that whole 15 ugly sweater thing. We've done some of those. 16 BY MR. ROSENBLATT: 17 Q. Did you ever use a photograph taken by 18 Katarina Benzova for a T-shirt? 19 A. I would think so. 20 Q. Did you get her written explicit permission 21 before? 22 A. I don't think so. 23 Q. Did you profit from a T-shirt that used a 24 photo of Katarina Benzova? 25 A. If there are.

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Page 130 1 Q. Where did you sell that? 2 A. If there are T-shirts with photos that were 3 taken by Kat Benzova, that we own, then possibly we 4 profited from that T-shirt. 5 Q. Did you ever sell those T-shirts at a concert? 6 A. If what I just said, then that would be the 7 next step, that they were probably sold at concerts. 8 Q. And you believe you cooperated with Bravado to 9 create that T-shirt? 10 A. Yes. It's my understanding. 11 Q. Who informed you of that? 12 A. Well, it's our merchandise -- the merchandise 13 company that we work with. So unless we're in South 14 America or Asia, then we're dealing with our merchandise 15 company, except for the bootlegs in these other places. 16 Q. And who do you deal with in South America? 17 A. Well, I'm not saying that we deal with a 18 different company. I'm just saying that they make 19 T-shirts with me and Bugs Bunny and Elmer Fudd and every 20 other -- and Iron Man and anybody else, and they sell 21 them. 22 Q. They don't know how to -- 23 They don't respect intellectual property? 24 A. Right. 25 Q. You know how to protect your own intellectual	Page 131 1 property, though? 2 MR. GUTMAN: Objection. Argumentative. 3 Foundation. 4 THE WITNESS: Not the specifics, no. I mean, I 5 would talk with my attorneys. 6 BY MR. ROSENBLATT: 7 Q. Have you taken affirmative steps to protect 8 your own intellectual property? 9 A. I believe that we have. 10 Q. How many attorneys do you have? 11 MR. GUTMAN: I'm sorry, what was the question? 12 BY MR. ROSENBLATT: 13 Q. How many attorneys do you have? 14 A. In regards to what? 15 Q. In regards to protecting your own intellectual 16 property. 17 A. Well, I don't know how many attorneys work for 18 the other attorneys. You know, for each attorney, 19 there's -- you know, there's their staff. I know 20 there's three primaries. And depending where, there may 21 be more, especially overseas. And then you have the 22 label's attorneys, if there is any involvement. 23 Q. I just want to get everything right here. 24 Beta Lebeis is Fernando's mother? 25 A. Yes.
Page 132 1 Q. Beta Lebeis is the mother of Vanessa Santos? 2 A. Yes. 3 Q. Beta Lebeis is the mother of Alex Santos? 4 A. Yes. 5 Q. Fernando Lebeis is a brother or half-brother 6 to Vanessa and Alex? 7 A. Full brother. 8 Q. Excuse me? 9 A. Full brother. 10 Q. "Full brother." 11 Is there anyone else in Team Brazil? 12 A. I am not aware of the depth of Team Brazil and 13 who exactly Fernando delegates to in the company. 14 Q. Are Team Brazil in charge -- do approximately 15 150 members go on -- 16 There's a 150-member crew for each concert? 17 Is that approximately correct? 18 A. That's -- I don't know that that's considered 19 Team Brazil. The production crew is the production crew 20 overseen by Opie Skjerseeth. We always -- I've known him 21 for 30 years. I don't know how to pronounce his last 22 name. 23 Q. Who? 24 A. Opie Skjerseeth. He's our production manager, 25 he's the Rolling Stones's production manager, he's	Page 133 1 AC/DC's production manager. 2 Q. And how does Team Brazil deal with the 3 production crew? 4 A. Awesomely. 5 Q. I meant more in a practical fashion. 6 A. Work together to sort out how the tour is 7 gonna go. 8 Q. So they hire every member of the crew? 9 MR. GUTMAN: Who's "they"? 10 MR. ROSENBLATT: Team Brazil. 11 THE WITNESS: Well, that varies. I do not know 12 what Opie -- if he has a separate -- if it's a different 13 company or corporation and what it's called. But 14 there's a joint thing of working out and deciding who is 15 hired. Like, for example, right now we are hiring a new 16 sound man. Opie did the interviews and has come up with 17 an individual. Slash has interviewed him. I've heard 18 his stuff. And that's who we are going to attempt to 19 work with, but this is all decided together. 20 MR. GUTMAN: Let me just interrupt. You're doing 21 wonderfully. You don't have to volunteer any 22 information. All you need to do is respond to his 23 question, does Team Brazil, "they," hire all of these 24 people? That's all you need to do. 25 MR. ROSENBLATT: Mark for the record that Alan

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Page 134 1 Gutman is coaching the witness. 2 MR. GUTMAN: I let him answer the question. You 3 can mark whatever you want, Counsel. Hopefully you'll 4 learn what you're doing someday, but I'm trying to help 5 you. 6 MR. BJORGUM: Why would you help out the opposing 7 counsel? That's kind of odd. 8 MR. DEIXLER: Because it helps everybody for the 9 system to work. So when there's ineptitude, we try to 10 do what we can to try to smooth this along. You might 11 want to look into it. 12 MR. BJORGUM: I like that you're helping him with 13 his questions. That's very nice of you. 14 MR. DEIXLER: It's required. 15 MR. BJORGUM: No, it's not. Generally, I'd let him 16 hang himself, but you guys help him out. 17 MR. DEIXLER: He's doing that as well. 18 MR. GUTMAN: Yeah, and wasting our time. 19 MR. BJORGUM: He gets seven hours on the record. I 20 can't help with that. 21 MR. GUTMAN: For harassment. I understand. 22 MR. DEIXLER: Do you have a question, Counsel? If 23 so, this would be an opportune time to put it. 24 BY MR. ROSENBLATT: 25 Q. So if someone had an issue with Fernando, who	Page 135 1 would they report it to? 2 MR. GUTMAN: Incomplete hypothetical. Calls for 3 speculation. 4 BY MR. ROSENBLATT: 5 Q. If one of the crew members had an issue with 6 Fernando, who would they report it to? 7 MR. GUTMAN: Incomplete hypothetical. Calls for 8 speculation. 9 THE WITNESS: I would say it could be me, it could 10 be -- they may go to Opie. They may talk with Beta, in 11 the sense of generally everyone talks with Beta. 12 BY MR. ROSENBLATT: 13 Q. Is this a known procedure? 14 A. Yes. 15 MR. GUTMAN: Objection. Speculation. Incomplete 16 hypothetical. 17 THE WITNESS: Kat would talk with Beta. 18 BY MR. ROSENBLATT: 19 Q. So do you think it's appropriate, if you have 20 an issue with Fernando Lebeis, to report to his mother? 21 MR. GUTMAN: Objection. Foundation. Incomplete 22 hypothetical. Speculation. 23 THE WITNESS: Do I think it's what? 24 MR. ROSENBLATT: Inappropriate. 25 THE WITNESS: Inappropriate? Absolutely not.
Page 136 1 BY MR. ROSENBLATT: 2 Q. Why not? 3 A. Because Beta is an integral part of the 4 functioning of Guns N' Roses and looking out for 5 virtually everyone's best interest in making it work as 6 a team. 7 Q. So Kat alleges she was sexually harassed by 8 Fernando. Do you think it's appropriate that the only 9 recourse she had was to go to his mother? 10 MR. GUTMAN: Objection. Assumes facts. 11 Foundation. And calls for an opinion. 12 THE WITNESS: That's not my understanding, that 13 that would be her only recourse. I already just said 14 that. 15 BY MR. ROSENBLATT: 16 Q. What are the other recourses? 17 MR. GUTMAN: What's the question? I can't hear 18 you. You mumbled. 19 BY MR. ROSENBLATT: 20 Q. What's the recourse that a production crew 21 member has if they were sexually harassed by Fernando 22 Lebeis? 23 MR. GUTMAN: Incomplete hypothetical. Calls for 24 speculation. Asked and answered. 25 THE WITNESS: They could come to me, they could go	Page 137 1 to Beta, they could possibly go to Opie, and they could 2 go to -- they could take it outside, to outside counsel 3 or something. 4 BY MR. ROSENBLATT: 5 Q. Was this procedure made known to any crew 6 members? 7 MR. GUTMAN: Objection. Foundation. Speculation. 8 THE WITNESS: There hasn't been any reason that I'm 9 aware of to make something known like that. Everyone 10 tries to respect everyone. Everything runs -- 11 especially working with Slash and Duff for these last 12 12 years, in general, most things have ran much smoother 13 than they ever have. 14 BY MR. ROSENBLATT: 15 Q. Did Fernando Lebeis have a supervisory 16 capacity over Kat Benzova? 17 MR. GUTMAN: Objection. Vague and ambiguous. 18 THE WITNESS: In what sense, please? 19 BY MR. ROSENBLATT: 20 Q. Did he oversee her work? 21 MR. GUTMAN: Objection -- 22 THE WITNESS: I -- 23 MR. GUTMAN: Objection. Foundation. 24 Go ahead. 25 THE WITNESS: I think we already -- I was already

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Page 138 1 asked about who could approve photos and things like 2 that. Also, if for some reason it was deemed that, say, 3 somebody didn't want their photos taken that night -- 4 and this is just a hypothetical, but then they could 5 tell Fernando or Beta, "Hey, I don't want my photos 6 taken tonight," and then that would be communicated to 7 Kat. 8 BY MR. ROSENBLATT: 9 Q. Did he have the authority to determine her 10 compensation? 11 A. In the sense of sorting out the contract and 12 what we believe is fair. And at the same time, I would 13 be approving it, or if things were changing, then it 14 would be brought to my attention, what do I think, 15 meaning like with the flying back and forth to New York 16 from Asia and paying for therapy, it's like I could have 17 chosen, okay, I want to do it, but it didn't make sense 18 to me, and there were various reasons. And 19 unfortunately, Kat was being very erratic due to 20 whatever prescriptions -- I believe they were 21 prescriptions -- she was on, which we had, like, empathy 22 for, so... 23 Q. Did Fernando Lebeis ever invite Kat to his 24 hotel room at 6:30 in the morning? 25 A. I do not know, but the idea of band and crew	Page 139 1 inviting -- if you're talking about after a show, 2 sometimes things go on for a couple hours or they go on 3 for many hours, and it depends how late the show was. 4 So it's very possible. It's very possible that she 5 wasn't the only one invited, and probably not. 6 Q. Are you aware that he asked her for back 7 massages? 8 A. I know nothing about that. 9 Q. Do you think it's appropriate for a member of 10 Team Brazil to ask a crew member for a back massage? 11 A. We generally travel with one to three 12 masseuses who are highly skilled. So if you needed a 13 back massage, that is generally where you would go 14 unless you hired someone from the hotel itself. 15 MR. ROSENBLATT: Can you repeat the pending 16 question. 17 Just a yes or no, please. 18 (Last question read.) 19 THE WITNESS: Depending on the crew member. 20 BY MR. ROSENBLATT: 21 Q. What do you mean by that? 22 A. I already answered that. 23 Q. So it could be? 24 MR. GUTMAN: That's what he just said. 25 ///
Page 140 1 BY MR. ROSENBLATT: 2 Q. Would it be appropriate if it was in a sexual 3 manner? 4 MR. GUTMAN: Objection. Vague and ambiguous. 5 THE WITNESS: I do not know about the personal 6 relationship. I'm not aware of anything like that. 7 MR. DEIXLER: When you come to a logical stopping 8 point -- and I hate to break your momentum, but if you 9 do, maybe we should take a lunch break. But I don't 10 want to interfere with your -- your momentum. 11 BY MR. ROSENBLATT: 12 Q. Do you believe you've been unjustly enriched 13 by using Ms. Benzova's creative work without 14 compensating her? 15 MR. GUTMAN: Objection. Foundation. 16 Argumentative. Legal conclusion. It's vague and 17 ambiguous. 18 THE WITNESS: As far as I know, she has been 19 compensated. 20 BY MR. ROSENBLATT: 21 Q. Do you believe you have been unjustly enriched 22 by using her creative work without compensating her? 23 MR. GUTMAN: Asked and answered. Objection. 24 Foundation. 25 MR. ROSENBLATT: It's just a yes-or-no question.	Page 141 1 MR. GUTMAN: Calls for a legal conclusion. 2 THE WITNESS: The question is asked in a way 3 that -- I don't believe it even exists. So I don't know 4 how to even answer that question. 5 MR. ROSENBLATT: How much time have we been on the 6 record? 7 THE VIDEOGRAPHER: We've been on the record 3 8 hours, 1 minute. 9 MR. ROSENBLATT: Okay, yeah, we'll stop there. 10 THE VIDEOGRAPHER: We're going off the record. The 11 time is 2:07 p.m. 12 (Lunch break.) 13 THE VIDEOGRAPHER: We're back on the record. The 14 time is 3:11. 15 MR. ROSENBLATT: Zach Rosenblatt representing 16 Katarina Benzova. We're here at the deposition with Axl 17 Rose. We just had lunch. 18 And so the next portion, I'm gonna show you a 19 bunch of photos, and I'm gonna ask you the same 20 questions over and over and over again. You can go 21 through each one, but I don't want you to think it's 22 harassment. I'll tell you what my plan is before, okay? 23 So I'm not trying to be unnecessarily repetitive. I 24 just have to ask the questions for each particular 25 photo, okay?

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Page 142 1 THE WITNESS: We can do that in four hours? 2 MR. ROSENBLATT: It might take four hours. 3 MR. GUTMAN: Are we marking this for 4 identification? 5 MR. ROSENBLATT: Yeah, mark it as -- 6 MR. DEIXLER: Why don't you give it to the court 7 reporter, who does the marking. 8 MR. ROSENBLATT: Mark it as Exhibit 102. 9 THE REPORTER: I think we have a 102. 10 MR. ROSENBLATT: 103. 11 (Defendant's Exhibit 103 was marked.) 12 BY MR. ROSENBLATT: 13 Q. Have you ever seen that photo? 14 A. No. I like it. 15 Q. So you don't know -- did you approve of that 16 photo? 17 A. Not directly. But I would say that I would 18 imagine my team did, unless it's a bootleg that somebody 19 else may have, because like I said, again, this is South 20 America, and I never know exactly who is behind what is 21 being made. They sell everything. They sell posters, 22 they sell individual photos, they sell T-shirts. Like I 23 said, they have no -- like you said, they have no 24 respect for intellectual property. So it's just nuts. 25 When we first played Rock In Rio, they had 70 bootleg	Page 143 1 T-shirt booths, and then we found out they were ran by 2 the cops, so... 3 Q. It's corrupt? 4 A. Yeah. 5 Q. So did this appear on any Guns N' Roses 6 websites? 7 A. I don't know. 8 Q. Did you get a written release from Kat Benzova 9 to use this photograph? 10 A. I don't know that we would have been required 11 to have one. 12 Q. Did you ever sublicense this photograph? 13 A. I don't know anything about how this 14 photograph came about to be used. I don't know if this 15 was a poster or what. I don't know. 16 Q. Did you ever publicly state that you were the 17 owner of this photograph? 18 A. Specifically, no. 19 Q. Did you ever warrant and represent to any 20 third party that you were the owner of this photograph? 21 A. I would say if there were some question that 22 reached management and/or attorneys, then that would 23 probably have happened on my behalf. 24 Q. And they would have talked to Fernando? 25 A. Fernando or Doug Mark.
Page 144 1 Q. And it's possible that Vanessa Lebeis approved 2 of this photo? 3 A. Yes, that's possible. 4 Q. Okay. Okay. And what do you think these 5 words mean down here? What do you think these refer to? 6 A. At the bottom? 7 Q. Yeah. 8 A. Different cities and venues. 9 Q. Do they have dates? 10 A. Yeah, the dates of playing different cities. 11 Q. Do you think they refer to concert dates that 12 you played? 13 MR. DEIXLER: Calls for speculation. No 14 foundation. 15 THE WITNESS: Yes, but I also think that the photo 16 was probably in England. 17 BY MR. ROSENBLATT: 18 Q. In England? 19 A. Yeah. 20 Q. You mean the setting was taken in England 21 because you're wearing the T-shirt? 22 A. Yeah, because -- I don't know -- it's 23 possible, but I don't know that I would be wearing that 24 in South America -- 25 Q. In a different country?	Page 145 1 A. -- so they just used this shot for whatever. 2 Q. Okay. 3 A. An English flag is kind of a rock and roll 4 thing, so... 5 Q. So it's likely that this picture was taken at 6 a concert in England? 7 A. Yes. 8 Q. And you believe you own this photograph? 9 MR. GUTMAN: Objection. Asked and answered. 10 MR. ROSENBLATT: It's the specific -- 11 THE WITNESS: If this is a photo -- 12 MR. ROSENBLATT: -- specific photographs -- 13 THE WITNESS: If this is a photo taken by Kat 14 Benzova on tour with us, then yes. 15 BY MR. ROSENBLATT: 16 Q. Okay. Okay. Do you think this photograph is 17 being used to promote concerts? 18 MR. GUTMAN: Objection. Foundation. Speculation. 19 THE WITNESS: It would appear so. Unless it's 20 after the fact. 21 BY MR. ROSENBLATT: 22 Q. Do promotions like this contribute to concert 23 revenue? 24 MR. GUTMAN: Objection. Foundation. Speculation. 25 THE WITNESS: Possibly. And I would say that in

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Page 146 1 the sense of sometimes tickets are sold as soon as it's 2 announced, and sometimes they're sold out right away. 3 So that could be sold out right away before any 4 advertisement of any kind goes up. But the 5 advertisement is still there. And sometimes that's in 6 consideration of if you may add another show. 7 BY MR. ROSENBLATT: 8 Q. So these drive aware- -- promotions like this 9 drive awareness to the concert where people may buy 10 tickets to it? 11 MR. GUTMAN: Objection. Foundation. Speculation. 12 THE WITNESS: Yes. 13 BY MR. ROSENBLATT: 14 Q. And that's the purpose of this type of 15 promotion? 16 MR. GUTMAN: Objection. Foundation. Speculation. 17 THE WITNESS: I believe so. Or just letting people 18 know, aware of it after the fact. Certain concerts sell 19 quicker than others, and they're -- like as far as I 20 know, on our upcoming tour, tickets -- some places sold 21 out as soon as they were announced, and I don't know 22 that any advertisements went up. At the same time, we 23 could get there, and it could be an advertisement's up. 24 Why exactly that is, I don't know. Maybe just to make 25 the city aware that we're there. I don't know what the	Page 147 1 actual purpose of that after the fact is. 2 BY MR. ROSENBLATT: 3 Q. So what about Mexico City? Was that sold out 4 beforehand without any promotion? 5 MR. GUTMAN: Objection. Foundation. 6 THE WITNESS: You mean upcoming? 7 MR. ROSENBLATT: No. 8 THE WITNESS: Or prior? 9 MR. ROSENBLATT: Prior. 10 THE WITNESS: The last Mexico City show? 11 MR. ROSENBLATT: Yes. 12 MR. GUTMAN: Well, he's saying the last one or the 13 one referred to in Exhibit 103? 14 MR. ROSENBLATT: Alan, please don't coach the 15 witness. 16 MR. GUTMAN: That's not coaching. If you don't 17 know what you're doing, just say so, but don't act in an 18 unprofessional manner. You're really, really acting 19 unprofessionally. 20 MR. ROSENBLATT: Alan... 21 MR. GUTMAN: And act in a civil manner. 22 MR. ROSENBLATT: Alan... 23 MR. GUTMAN: It's not coaching, all right? So 24 don't say that. 25 MR. ROSENBLATT: Alan...
Page 148 1 MR. GUTMAN: If I'm asking a question because you 2 ask a question inarticulately and you don't know what 3 you're saying, it's for clarification. So ask a 4 question properly, and if I ask you to clarify it, just 5 do so, and we can move on, instead of you making your 6 comments. 7 THE WITNESS: I don't know when this Mexico City 8 show is. 9 MR. ROSENBLATT: Okay. 10 THE WITNESS: I mean, I see that it's allegedly the 11 21st. 12 MR. ROSENBLATT: Okay, we're gonna move on to the 13 next photograph. Mark this as Exhibit 104. 14 MR. GUTMAN: This is being marked as what? 15 MR. DEIXLER: 104. 16 MR. GUTMAN: Thank you. 17 (Defendant's Exhibit 104 was marked.) 18 BY MR. ROSENBLATT: 19 Q. Do you recognize this photograph? 20 A. Not specifically, no. 21 MR. GUTMAN: There's actually three photographs on 22 this page. Is there one in particular that you're 23 referring to? And I realize I might be coaching, but do 24 you want to clarify which photograph you're referring 25 to?	Page 149 1 BY MR. ROSENBLATT: 2 Q. The picture of yourself, Axl Rose. 3 MR. GUTMAN: Thank you. 4 THE WITNESS: No. 5 MR. ROSENBLATT: Mr. Axl Rose, sorry. I apologize. 6 THE WITNESS: But I do like it. 7 BY MR. ROSENBLATT: 8 Q. Did you approve this photograph? 9 A. Not specifically, no. 10 Q. Did Vanessa -- 11 A. I don't know which person did, and there may 12 have even been times when I don't know specifically if 13 Kat may have just approved photos, knowing what prior 14 photos we liked, and something similar, and as long as 15 it seemed like it was similar, maybe that was okay. But 16 I'm not sure. They might have then gone from her to 17 Vanessa. I didn't hear issues with them until the last 18 legs or whatever. 19 Q. Did you get a written release from Kat in 20 connection with this photograph? 21 A. I don't know why I would get a written release 22 if I owned the photo. 23 Q. Do you recognize Katarina Benzova as the owner 24 of this photograph? 25 MR. GUTMAN: Objection. Foundation. Legal

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Page 150 1 conclusion. 2 THE WITNESS: Not if she took it on our tour, no. 3 BY MR. ROSENBLATT: 4 Q. Did you ever publicly state that you were the 5 owner of this particular photograph? 6 A. I don't know that I've publicly stated I'm the 7 owner of any photographs anywhere. 8 Q. Did you ever warrant and represent to any 9 third party -- 10 A. Well, except for here. 11 Q. What? 12 A. Except for here. 13 Q. "Except for here." 14 Did you ever warrant and represent to any 15 third party that they were the owner of this -- that you 16 were the owner of this photograph? 17 MR. GUTMAN: Objection. Foundation. 18 THE WITNESS: I would think that there's a really 19 good possibility that management and legal would have. 20 BY MR. ROSENBLATT: 21 Q. If you had a written release from Katarina 22 Benzova for this photograph, would you provide it to us? 23 MR. GUTMAN: Incomplete hypothetical. Calls for 24 speculation. 25 THE WITNESS: I would refer to counsel's advice on	Page 151 1 that. 2 BY MR. ROSENBLATT: 3 Q. Are you not gonna answer the question? 4 A. I just answered it. I would refer to 5 counsel's advice on if I would submit some photo, or was 6 it a document? 7 Q. If you would provide a written release from 8 Kat. If you had possessed a written release from 9 Katarina Benzova in connection with the use of this 10 photograph, would you provide it to us? 11 MR. GUTMAN: Counsel, you're harassing the witness. 12 You know the answer to the question already. Can you 13 please move on, ask a relevant question. 14 MR. BJORGUM: It is relevant. 15 MR. ROSENBLATT: It is relevant. 16 MR. GUTMAN: The answer is no. What part don't you 17 understand? He's not producing anything here today. So 18 just ask a question. 19 MR. BJORGUM: He's asking about his common 20 practice, how he deals with this. 21 MR. DEIXLER: No, he isn't. Please stop. 22 MR. BJORGUM: No. 23 MR. DEIXLER: You have nothing to say. 24 MR. BJORGUM: I'm tired of you guys -- 25 MR. DEIXLER: Ask your question.
Page 152 1 MR. BJORGUM: -- beating up on this guy -- 2 MR. DEIXLER: Ask your questions. 3 MR. BJORGUM: -- like the new lawyer is supposed to 4 be at your firm for 30 years. This is why new lawyers 5 don't get any shots, because you guys treat him like 6 crap. 7 MR. DEIXLER: Okay, now, what you talking about? 8 MR. BJORGUM: I do. 9 MR. DEIXLER: You really don't know what you're 10 talking about. 11 MR. BJORGUM: Yes, I do. 12 MR. DEIXLER: Just ask your question, Counsel. 13 MR. BJORGUM: I've never seen someone say, "Take my 14 class." It's like, come on, man. 15 MR. ROSENBLATT: All right, let's get back to the 16 deposition. Let's focus on why we're here. 17 MR. GUTMAN: Okay, ask a question. 18 MR. ROSENBLATT: Okay. I'm unclear. So I'm asking 19 again. I'm not asking to harass, Mr. Gutman. 20 Q. Do you have a written release -- 21 MR. GUTMAN: That was asked and answered. 22 BY MR. ROSENBLATT: 23 Q. -- that specifically authorizes for the use of 24 this particular photograph? 25 MR. GUTMAN: That was asked and answered.	Page 153 1 THE WITNESS: I have no idea. 2 MR. ROSENBLATT: You have no idea. 3 THE WITNESS: And I have no idea why I would ask 4 for a release for something that I own. 5 MR. ROSENBLATT: We're gonna move to the next 6 photograph. Please mark this as -- are we at Exhibit 7 106? 8 MR. DEIXLER: 5. 9 MR. ROSENBLATT: 5. 10 (Defendant's Exhibit 105 was marked.) 11 BY MR. ROSENBLATT: 12 Q. Do you recognize this photograph, Mr. Rose? 13 A. Not in particular, no. 14 Q. Does this look like a picture of Guns N' 15 Roses? 16 A. Well, it's of the like that we've done and 17 that are done of me from behind, but I can't 18 specifically say that. I could guess that that's 19 correct. Looks like you could also try to re-create it. 20 I don't know. 21 Q. Okay. Can you read the website at the very 22 top? Or can I read it to you? 23 A. Hold on. Are you saying the Rolling Stone 24 website? 25 Q. Mm.

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Page 154 1 A. Oh, okay. 2 Q. And the title says Rolling Stone; right? 3 A. So it appears to be Rolling Stone Argentina. 4 Q. Right. And it says "Guns N' Roses" in the 5 title above the photograph; right? 6 A. Yes. 7 Q. Okay. Do you believe you own this photograph? 8 A. If Kat or one of our people have taken this, 9 yes. 10 Q. Did you get a specific written release from 11 Katarina Benzova to use this photograph? 12 MR. GUTMAN: Objection. Foundation. 13 THE WITNESS: It's my understanding we have a 14 blanket release. 15 BY MR. ROSENBLATT: 16 Q. Will you please just answer yes or no. 17 Do you have a specific document that 18 delineates specific use to Rolling Stone magazine in 19 Argentina? 20 MR. GUTMAN: Objection. Foundation. 21 THE WITNESS: No idea. 22 BY MR. ROSENBLATT: 23 Q. "No idea." Who would know? 24 MR. GUTMAN: Objection. Foundation. 25 THE WITNESS: Possibly management.	Page 155 1 BY MR. ROSENBLATT: 2 Q. Fernando Lebeis would know? 3 A. Possibly. 4 Q. Would Vanessa Santos know? 5 A. That, I don't know. I don't know that she 6 deals directly with where the photos go, as opposed to 7 just approving the photos themselves for use. 8 Q. Okay. Did you sublicense this photo for any 9 other use? 10 MR. GUTMAN: Objection. Foundation. Speculation. 11 Vague and -- hold on one second. Vague and ambiguous. 12 Calls for a legal conclusion. 13 THE WITNESS: Personally, I would say not directly, 14 no, and I'm not aware of it. 15 BY MR. ROSENBLATT: 16 Q. You authorized -- 17 MR. GUTMAN: I'm sorry, what's the question? 18 BY MR. ROSENBLATT: 19 Q. Did you authorize someone to sublicense this 20 photo on your behalf? 21 MR. GUTMAN: That's the question you just answered; 22 right? 23 MR. ROSENBLATT: It's not the same question. 24 MR. GUTMAN: Can I have the question back? 25 (Last question read.)
Page 156 1 THE WITNESS: I authorized my team to use our 2 photos in whatever ways that they or we feel is best to 3 use them, often in just -- like a lot of times, just to 4 make whatever media wants involved happy. Like say 5 Rolling Stone wants a photo. Well, then we've already 6 approved photos, and then someone decides what to send 7 them. I don't know how many were sent. Maybe -- maybe 8 they were sent one, maybe they were sent twenty and they 9 chose this one. I don't know. 10 BY MR. ROSENBLATT: 11 Q. And how did they send them? 12 A. I wouldn't know. 13 Q. How do you believe -- 14 A. Probably, I would guess, e-mail. I don't 15 know. And I don't know what -- you know, sending it 16 digitally. Or if they're sending negatives, that would 17 be some other way. 18 Q. Have you ever destroyed a photographer's 19 negatives? 20 A. I don't recall doing that, no. 21 Q. You don't recall because it never happened, or 22 you don't remember? 23 MR. GUTMAN: The question is vague and ambiguous 24 and unintelligible. 25 MR. ROSENBLATT: Please repeat the question, the	Page 157 1 pending question. 2 (Last question read.) 3 THE WITNESS: Are you talking about -- well, first, 4 I want to just clarify, you're talking about Guns N' 5 Roses photos of any kind? 6 BY MR. ROSENBLATT: 7 Q. A photograph of Guns N' Roses, have you ever 8 destroyed a negative of a photograph of Guns N' Roses? 9 MR. GUTMAN: Let me interpose -- 10 THE WITNESS: I don't recall. 11 MR. GUTMAN: Easy enough. 12 THE WITNESS: I will say if -- you know, I don't 13 know that we keep photos that we don't like around. I 14 don't know -- I don't recall what we do with them. That 15 may have happened in actually being involved with 16 destruction of photos in our early club days. 17 BY MR. ROSENBLATT: 18 Q. So in your early club days, you may have 19 personally -- 20 A. May have. 21 MR. GUTMAN: Let me interpose an objection. 22 Manifestly irrelevant. Completely -- not 23 reasonably calculated -- 24 THE WITNESS: But I don't know for sure. 25 MR. GUTMAN: Not reasonably calculated to lead to

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Page 158 1 the discovery of admissible evidence. Unless there's 2 some specific evidence regarding negatives, which I 3 thought were from an era before digital photography, 4 that you think is relevant in this case, I'm going to 5 instruct him not to answer. Let's go. You're wasting 6 so much time. Just, let's go. 7 MR. ROSENBLATT: Are you instructing him not to 8 answer? 9 MR. BJORGUM: Just ask the next question? 10 MR. GUTMAN: The next question, yes. And start 11 asking some relevant questions, instead about negatives 12 that might have been destroyed in the 1990s. 13 MR. BJORGUM: It is relevant. He's getting there. 14 MR. GUTMAN: You want to explain why, instead of 15 mumbling? 16 MR. BJORGUM: Because it contradicts what he said 17 earlier. That's why. 18 MR. GUTMAN: What? 19 MR. BJORGUM: You guys gotta pay attention. 20 THE WITNESS: Well, I'd like to know what I'm 21 contradicting. 22 MR. DEIXLER: He's just making noise. Pay no 23 attention. 24 MR. ROSENBLATT: So will you repeat the answer to 25 the question.	Page 159 1 Q. Have you ever destroyed any negatives of any 2 photographs of Guns N' Roses? 3 A. I don't recall that. 4 MR. GUTMAN: Wait, wait, wait. I thought you were 5 just reading back the last answer. 6 (Record read as follows: "May have," "But I 7 don't know for sure.") 8 MR. GUTMAN: Do you want to enter into a 9 stipulation regarding the photos if you're gonna show -- 10 like we could spend five minutes off the record. You 11 could show us all, whatever, 50 or 1,000 photographs. 12 And if you're gonna ask the same five or six questions 13 about each one of the photographs, we can just look at 14 them, and it'll probably be the same answer for every 15 single question. You want to do that? 16 MR. ROSENBLATT: That's why I asked. That's why I 17 said in the beginning we can either go through each 18 until -- you're open to that. So I'm open to that for 19 most of the photographs, but not all of the photographs. 20 So do you want to go off the record? 21 MR. DEIXLER: Why don't you go to your smoking-gun 22 photographs, and then we'll stipulate to the other ones 23 that are more anodyne. 24 MR. ROSENBLATT: I'll determine the order of 25 questioning. So not for this photo. This is gonna be
Page 160 1 marked as Exhibit 107? 2 THE REPORTER: 6. 3 (Defendant's Exhibit 106 was marked.) 4 THE WITNESS: Do I have to look at myself all day? 5 Can we look at others? This is where I want to be a 6 Sports Illustrated, you know, photo approval guy. I 7 don't know, it doesn't look good with that wave. 8 MR. DEIXLER: What's the question, Counsel? 9 BY MR. ROSENBLATT: 10 Q. Do you recognize any of these photographs? 11 A. Well, they appear to be us or crowds that may 12 be us, but I don't exactly recognize the photos. 13 Q. Do you know what Mercury Concerts is? 14 A. No. 15 Q. You have no idea? 16 Would anyone in your team know -- 17 MR. DEIXLER: He shook his head. The witness shook 18 his head in a negative way, the witness did. Next 19 question. 20 BY MR. ROSENBLATT: 21 Q. Would anyone in your team know who Mercury 22 Concerts is? 23 MR. GUTMAN: Objection. Foundation. Speculation. 24 THE WITNESS: I don't know what Mercury Concerts 25 is. So I don't know if anyone in my organization knows	Page 161 1 what Mercury Concerts is, you know. 2 BY MR. ROSENBLATT: 3 Q. Did you ever authorize Mercury Concerts to 4 reproduce a photograph? 5 A. Personally, not that I'm aware of. 6 Q. Did you ever deliver any photographs to 7 Mercury Concerts? 8 A. Not that I'm aware of. I don't know what 9 Mercury Concerts is, or aware it is. 10 Q. Is Mercury Concerts affiliated with Live 11 Nation? 12 A. No idea. 13 Q. Did you get a written release from Katarina 14 Benzova that specifically authorizes any use on Mercury 15 Concerts with Mercury Concerts? 16 A. I don't know that -- that we specifically got 17 releases from her on anything that I believe that we 18 already owned, if she was photographing us in any 19 capacity, shows, airports, hotels. 20 Q. So did you ever warrant and represent to 21 Mercury Concerts that you were the owner of any of the 22 photos that are in this picture? 23 MR. GUTMAN: Objection. Foundation. 24 THE WITNESS: Not myself, and I wouldn't know if 25 someone else did or not.

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Page 162 1 BY MR. ROSENBLATT: 2 Q. You wouldn't? 3 A. No, wouldn't know. 4 Q. Why wouldn't you know? 5 MR. GUTMAN: Objection. Foundation. Calls for 6 speculation. Harassment. 7 THE WITNESS: Well, one, as I said, I do not know 8 where Mercury Concerts were. I do not know if we, Live 9 Nation, or anyone actually worked with something called 10 Mercury Concerts, and I wouldn't know in what capacity 11 they may have been involved. You know, it could be 12 something random at a club. It could be something that 13 they worked with several dates. I don't know what 14 Mercury is. 15 BY MR. ROSENBLATT: 16 Q. Did you ever sublicense the photo to Mercury 17 Concerts? 18 MR. GUTMAN: Objection. Foundation. 19 MR. DEIXLER: Lisa, would you do a favor for me? 20 Would you mark and keep separate the series of questions 21 on Mercury Concerts? Because I'm thinking about a 22 protective order now, not harassment. So if you could 23 just keep that readily accessible, we'd appreciate it, 24 thank you. 25 THE REPORTER: Okay.	Page 163 1 MR. DEIXLER: It is true that the whole is equal to 2 the sum of its parts. I hope we can agree to that. And 3 so I wish you would accept that mathematical proposition 4 and ask questions that reflect that so we're not wasting 5 time and harassing the witness. I'm asking you as 6 gently as I can, Counsel. 7 MR. ROSENBLATT: I appreciate your input. I have 8 no intent to harass the witness. I have a list of 9 questions that are relevant for each particular 10 photograph that's at issue in this lawsuit. I believe 11 this is going along in a calm way and -- 12 THE WITNESS: I mean, I can answer it pretty much 13 across the board. I don't know which photos were used 14 with what company. 15 MR. ROSENBLATT: Okay. 16 I'm gonna mark this as Exhibit 107. 17 (Defendant's Exhibit 107 was marked.) 18 THE WITNESS: I know a lot of actors that don't 19 look at their films. Denzel Washington doesn't watch 20 his films. Mickey Rourke doesn't watch his films. I 21 don't watch my concerts. I don't look at my photos in 22 general unless there is a reason for me to have to go 23 over it sonically, sound-wise. 24 BY MR. ROSENBLATT: 25 Q. Explain to me what that means.
Page 164 1 A. Like, if I need -- if we're doing something 2 for like -- we decide to record the show but it's gonna 3 be for a later broadcast, I may ask to hear the show to 4 make sure the mix is right and that I like our 5 performance and how it was recorded. It's the same with 6 photos. If -- like I said, I'm not aware of any DVD, 7 but if I was aware and involved of putting out a DVD, 8 then I may approve directly the photos used on that DVD. 9 Q. So it's your general artistic philosophy not 10 to observe yourself at your own concerts or your own 11 photos at the concert? 12 A. Primarily, yes. 13 MR. GUTMAN: Objection. Foundation. 14 But go ahead. 15 THE WITNESS: Primarily, yes. And generally, the 16 professional stuff that I'd seen up until around when we 17 were taking a hiatus with Kat, or wanted Kat to take a 18 hiatus, as far as I know, I was happy. Anything I had 19 seen, I was happy with. But I can't recall anything 20 specifically. I just look at my face and go, "okay." 21 MR. ROSENBLATT: Yeah, so that's speaking 22 generally. We're gonna go through each photo 23 specifically. 24 THE WITNESS: She did a really good job, you know, 25 apparently, until she didn't.	Page 165 1 BY MR. ROSENBLATT: 2 Q. So is it a pattern and practice for you to not 3 observe your own photos, whether they're in print or 4 from a concert? 5 A. Yes. 6 Q. But not totally? Sometimes you will approve 7 certain ones? 8 A. Well, here's -- here's -- there's an issue. A 9 lot of times in print, the photos aren't from us, 10 they're from -- they're from the audience. And it's 11 publications not wanting to pay people fairly or pay for 12 the use of the photos, and especially not wanting to pay 13 us for the use of the photos, and I don't know that our 14 rates are higher than anyone else. 15 But the other part of it is, is that I feel 16 there's a lot of games with media. If they want you to 17 read an article that's gonna take a dump on me, they'll 18 use a great photo, and that might lure you in. If they 19 wanted to take -- if it's an article that might even be 20 something good, then the odds are they're gonna use a 21 photo they think is bad, or at least I think is bad. 22 And this started in '91, because we were so popular, and 23 the magazines -- there was a monopoly on four 24 photographers. We brought our own photographer in and 25 said we want to work with him, and he became friends

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1 with all the other photographers. But the magazines got
2 mad with our power and then did not want to use his
3 photos and began using the public's photos. Not other
4 photographers, really, just random public photos. And
5 that's what happened in St. Louis. But then you realize
6 you couldn't do anything about it. So let it go.

7 Q. What's your fee for charging for the use of a
8 photograph?

9 A. It's my understanding that you go by what the
10 other photographers at that level of, say, a touring
11 photographer or a band-shooting photographer -- now, if
12 you go to have your band shot by a top fashion
13 photographer, that's a different rate. What those rates
14 are varies, but that's a higher thing because they have
15 a higher place in the echelon in the business. But in
16 the rock world, they're competing at a certain level,
17 and it's just whatever that is at the time, you know,
18 between all of them.

19 Q. So do you charge license fees for the photos
20 that are taken by Katarina Benzova?

21 MR. GUTMAN: Objection. Foundation.

22 THE WITNESS: I would think that we would charge
23 them to use the photos unless we chose not to charge
24 them for whatever reason.

25 ///

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1 And relevance.

2 THE WITNESS: It had to do with publications and
3 the editors and, from my position, lying about various
4 things to do with the band or myself or in reviews of
5 the show. Not necessarily writing a negative review but
6 writing a negative review that wasn't at all factual,
7 like saying it was raining and the crowd was mad and da
8 da da, when actually it wasn't raining and the crowd was
9 whistling along with the song. And they're writing how
10 the crowd hated Patience, but the majority of the crowd
11 at Donington is actually whistling the song. And the
12 girl writing the story, she was in the bar, not watching
13 the show. Okay? So things like that, then we would
14 call them out on it.

15 And then on Illusions, there was a song Get in
16 the Ring, and that was a song that Tom Zutaut -- Tom
17 Zutaut -- Duff mainly wrote the song, and Tom Zutaut
18 took me in the studio and wanted me to just go off on
19 the media. And it was kind of like Eminem before
20 Eminem, just going, "Da da da, and Andy Secher, you're
21 this and you're that, da da da." And I did it. And
22 boy, that really set them off. So things like that.
23 And they really chose to just find the worst photos they
24 could.

25 It's like, I remember a few years back,

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1 BY MR. ROSENBLATT:

2 Q. And who determines the price?

3 A. Us, based on the current market values of
4 photography in that vein.

5 Q. And how do you determine that current market
6 value?

7 A. Well, let's see. I would imagine -- I don't
8 know, someone like Annie Liebovitz would have a much
9 higher rate. Or if you had -- he's not alive now, but
10 say Herb Ritts shoot you, that would be a much higher
11 rate, and most of his photos sucked, but still, you're
12 paying that rate. But -- I liked Herb. But say Robert
13 John or Mark Weiss, Neil Zlozower, or Gene Kirkland at
14 the time, they're all at a lower level of rock
15 photography pay. And so you would just sort that out
16 with the magazines and what they're supposed to get
17 paid. And those guys ended up becoming friends. So
18 they didn't really have an iss- -- they were in
19 competition, but they didn't have a big issue with each
20 other. But the magazines decided they didn't want to
21 promote me, they would rather use shit-shots that turned
22 into a mess. And then -- then I just let it go.

23 Q. And they didn't want to promote you because
24 you -- because of why?

25 MR. GUTMAN: Objection. Speculation. Foundation.

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1 somebody took a bunch of really bad photos of Beyonce,
2 and it was just someone in the crowd, and they were
3 crap. But something wanted to take shots at Beyonce.
4 So that's the photos they ran, rather than in general
5 where they always ran good shots of her. But they
6 wanted to have some public things for a reason, and some
7 little tiff they were having between her and the media.

8 BY MR. ROSENBLATT:

9 Q. So do you have a distrust of how the media
10 uses photos of Guns N' Roses?

11 MR. GUTMAN: Objection. Misstates,
12 mischaracterizes. Argumentative.

13 And did you finish your prior answer? It
14 seemed like he interrupted you.

15 MR. ROSENBLATT: I apologize if I did.

16 THE WITNESS: I think I did.

17 It varies. It varies. I mean, I don't take
18 it blanket that I can just trust them, you know. If I
19 know somebody wants photos or whatever or wants -- I
20 haven't done interviews in -- I do them every few years
21 or more, and I haven't worried about what photos have
22 been used with the interviews. So I -- my trust kind of
23 depends on what my team feels, what our publicist feels,
24 and where we think the person's coming from, maybe by
25 the line of questioning, you know, for the interviews.

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Page 170 1 BY MR. ROSENBLATT: 2 Q. But you get to determine which photo is gonna 3 be used with the publication? 4 A. Not always, but you may try to. 5 Q. You try to as much as you can? 6 A. Yeah. 7 Q. And you instituted -- 8 A. Like with older Rolling Stone interviews, I 9 had complete control, and an example being inside, there 10 is a photo of me sitting on this sofa with a broken 11 mirror and a gun in my hand. And we had the say-so of 12 that. And that made -- that made the head of Rolling 13 Stone lose his mind because he was very anti-gun, but we 14 had the say-so. 15 Q. And do you get a written contract in order to 16 have -- 17 A. Yeah, that was in writing. 18 Q. How did you know to determine to put that in 19 writing? 20 A. I asked. We asked for complete control at 21 that time. 22 Q. Okay. Okay, we're gonna move on to the next 23 photograph. Actually, just a couple quick questions. 24 One more question. 25 Do you recognize this photograph?	Page 171 1 A. I don't recognize it, and it looks like me, 2 yes. 3 Q. And then you mentioned Annie Liebovitz? 4 A. Yes. 5 Q. Do you think she's a fine art photographer? 6 MR. GUTMAN: Objection. Vague, ambiguous, 7 foundation. 8 THE WITNESS: I think that it's possible certain 9 works and how they're presented, displayed, or on the 10 market can be termed that way, yes. 11 BY MR. ROSENBLATT: 12 Q. And so I'm just trying to organize everything. 13 So you have a policy where you don't want to 14 see, a lot of the times, your performance on stage or 15 photographs of yourself to maintain -- 16 A. I'm just too hard on myself. 17 MR. GUTMAN: Hold on. This has all been asked and 18 answered. He's just trying to do his little argument 19 here. 20 Ask your question. 21 MR. ROSENBLATT: Is that an objection? 22 MR. GUTMAN: Is your thing a question? You're just 23 arguing what has already been testified to. 24 BY MR. ROSENBLATT: 25 Q. As a result of that approach or philosophy, do
Page 172 1 you have a fixed system about which photos can get to 2 your attention? 3 A. No. No. It's generally not necessary. It 4 might be if not so much a Guns N' Roses advertisement, 5 and I'm not sure how it went down with HYT, but that 6 might be an example, "Will this photo be good enough? 7 Do you approve? Do you like this photo?" 8 "Yeah sure, looks good. I like it." As long 9 as HYT was happy. 10 Q. Did you sign an agreement with HYT, 11 authorizing your right of publicity? 12 A. Personally, I don't -- 13 MR. GUTMAN: Hold on one second. 14 Objection. Foundation. If there's a document 15 that has specific language, it would speak for itself. 16 Foundation. 17 Go ahead. 18 THE WITNESS: I don't know. 19 MR. ROSENBLATT: Coaching the witness. 20 MR. GUTMAN: Again with you, "coaching the 21 witness." 22 THE WITNESS: I don't know what he said. So I 23 didn't -- 24 MR. GUTMAN: I don't understand what he's mumbling. 25 THE WITNESS: I don't understand which way to throw	Page 173 1 the ball. 2 BY MR. ROSENBLATT: 3 Q. Do you believe it's possible that you signed a 4 written agreement with HYT, authorizing the right of 5 publi- -- your right of publicity in conjunction with 6 their ad campaign? 7 MR. GUTMAN: Objection. Foundation. Calls for 8 speculation. Anything's possible. 9 THE WITNESS: Personally, I have no idea. I do not 10 recall, to even say I don't think so. 11 BY MR. ROSENBLATT: 12 Q. Did you e-mail them that photo that they used? 13 MR. GUTMAN: You're talking about HYT now? 14 MR. ROSENBLATT: HYT. 15 THE WITNESS: Not me. 16 BY MR. ROSENBLATT: 17 Q. Fernando? 18 A. I wouldn't know. 19 Q. Perhaps Beta? 20 A. Perhaps Kat. 21 MR. ROSENBLATT: Perhaps Kat, okay. I'm gonna move 22 on to the next photograph. 23 MR. DEIXLER: How many more photographs do you 24 think you have? And I offer again the opportunity to 25 expedite all of this by taking a five-minute break,

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Page 174 1 having us look at it and agree that he didn't authorize 2 getting release from Kat because he didn't believe he 3 had to, and he's not sure what the source of it is, and 4 he doesn't remember consulting with her. 5 MR. ROSENBLATT: The thing is that we're getting a 6 lot of other good information. 7 MR. DEIXLER: You are? I guess we're not at the 8 same deposition. 9 MR. ROSENBLATT: Will you please mark this for 10 Exhibit 108. 11 (Defendant's Exhibit 108 was marked.) 12 MR. ROSENBLATT: We appreciate you being candid, 13 thank you, and your patience. 14 MR. DEIXLER: Don't comment on the witness or his 15 testimony. Do not do that. 16 THE WITNESS: This is a photo -- 17 MR. GUTMAN: Wait till a question is asked. 18 BY MR. ROSENBLATT: 19 Q. Do you recognize this photo? 20 A. You have already showed it to me. 21 Q. I've shown you this one? 22 A. I believe so. I think so. 23 Q. This is with you and Slash? 24 A. Yes. 25 Q. So Slash would be able to authorize this photo	Page 175 1 as well? 2 A. Yes. 3 Q. And did you guys confer about whether this 4 photo was approved? 5 A. Not directly between each other. 6 Oh, I'm sorry, I thought it was similar to 7 this one. 8 Q. That's okay. 9 A. But that's how that would have gone. Someone 10 on my behalf would have okayed -- "Okay, we think Axl 11 will like that." And Slash would have seen that and 12 either done that himself or had one of his delegates 13 approve it, if that, in fact, is how he does it. I'm 14 not sure. 15 Q. Okay. And then do you have an explicit 16 written release from Katarina Benzova in connection with 17 this particular use? 18 A. I'm not aware of having any explicit releases 19 other than the contract that says we own the photos in 20 regards to any photo taken by Kat Benzova. 21 Q. Which specific contract are you referring to 22 in your last response? 23 A. The same one that I've referred to since we 24 started this deposition. 25 Q. Is this the photograph that was presented to
Page 176 1 her in August of 2021? 2 MR. DEIXLER: I'm sorry, could I have that question 3 back, please. 4 MR. GUTMAN: You said "photograph" in the question. 5 BY MR. ROSENBLATT: 6 Q. Sorry, yeah, excuse me, I misspoke. 7 Is this the contract that was presented to Kat 8 Benzova in August of 2021? 9 A. I do not know. 10 Q. Are you aware of any other contracts that she 11 signed after August of 2021? 12 A. Well, as I've answered, I'm not aware of there 13 not being contracts signed till somewhere in 2021. So 14 to me, there were contracts signed since her hiring. 15 Q. Did you assume that a contract was signed 16 after 2021? 17 A. I do not specifically know when her services 18 were put on hiatus. I'm not specifically sure of what 19 year that was, if that was after '21 or during '21 or if 20 it was before one of the tour legs in '22. I know it 21 had something to do with Asia and South America, but I 22 don't recall when that exact leg was. 23 MR. ROSENBLATT: One moment. We'll come back to 24 it. Okay, we're gonna go to the next photo. Do you 25 guys want to take a break, and we'll see if we can --	Page 177 1 MR. DEIXLER: No, keep going. Keep going. You've 2 got momentum. I don't want to interrupt it. 3 MR. BJORGUM: No, but now we're doing what you 4 want, to take your break. So now you don't want to do 5 it. I think he's talking about taking the break to do 6 what you said, no? 7 MR. DEIXLER: I don't know. He didn't say that. 8 He said, "Do you want to take a break?" I didn't -- 9 although mind-reading is a pastime, I wasn't engaged in 10 it at the time. What is the purpose of the break? Is 11 it to finally discuss the stipulation that we had 12 proposed 48 minutes ago? 13 MR. BJORGUM: We need to look at -- 14 MR. DEIXLER: Excuse me, I wasn't talking to you. 15 If I want to talk to you, I'll address you. 16 MR. BJORGUM: Why don't we go off the record and 17 work this out. 18 MR. GUTMAN: I think we should do this on the 19 record, please. 20 So do you have a selection of photographs that 21 we can look at and -- 22 MR. BJORGUM: No. No. We have to go off the 23 record to do that. We don't have that. 24 MR. ROSENBLATT: We'll just go back, then. 25 MR. BJORGUM: Okay, start going back through them.

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1 It's what you guys want, if we can't go off the record.
2 MR. DEIXLER: Spend your time as you think best.
3 MR. BJORGUM: Okay.
4 MR. ROSENBLATT: Mark this into Exhibit 108?
5 MR. DEIXLER: 9.
6 MR. ROSENBLATT: 109.
7 (Defendant's Exhibit 109 was marked.)
8 MR. DEIXLER: I'm keeping a scrapbook, but I don't
9 think I'm going to include it.
10 BY MR. ROSENBLATT:
11 Q. Do you recognize that photograph?
12 A. Not particularly.
13 Q. Do you look at photos of Guns N' Roses if
14 you're not in it, or do you stay away from all
15 photographs of Guns N' Roses?
16 A. I see them unintentionally.
17 Q. How do you mean? Give me an example of how
18 you saw them unintentionally.
19 A. Clickbait.
20 Q. On social media?
21 A. I don't know about social media. I would just
22 say in Internet media. Or if there happens to be a --
23 maybe they have a magazine on the plane with a photo
24 shoot that Slash and Richard did and there's the cover,
25 but I didn't go through the magazine. And -- but I

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1 MR. GUTMAN: You don't have to worry about that.
2 THE WITNESS: Because you wanted to know who
3 authorized those photos.
4 MR. GUTMAN: No, just stick to his questions.
5 THE WITNESS: All right.
6 BY MR. ROSENBLATT:
7 Q. But Fernando could have authorized this
8 photograph?
9 MR. GUTMAN: Objection. Foundation. Speculation.
10 THE WITNESS: Through Slash or his representatives.
11 I am not aware --
12 BY MR. ROSENBLATT:
13 Q. Have you ever seen this?
14 MR. GUTMAN: You need to identify it on the record
15 instead of something as "Have you seen this?"
16 MR. BJORGUM: No, he doesn't.
17 MR. DEIXLER: Sure, he does.
18 MR. BJORGUM: If he's never seen it, then he's not
19 gonna ask him any questions.
20 MR. DEIXLER: Sure, he does. You need a record of
21 what has been shown to the witness. You really ought to
22 try some more cases. It'll really reflect better upon
23 your ability to speak in a deposition.
24 MR. BJORGUM: Oh, boy.
25 Have you seen that before, yes or no?

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1 don't go to Guns N' Roses sites or rock sites in
2 general, though they can show up on Google News, Yahoo
3 News, maybe CNN, depending what they want to say about
4 who. So that's how I would see stuff. If there's
5 something that got sent to the house and is sitting on
6 the table, I could ask what that is, but it usually
7 doesn't have to do with me personally. So it doesn't
8 matter.
9 Q. But you've delegated Fernando to vet the
10 photographs and approve the photographs?
11 MR. GUTMAN: Are you talking about in general or
12 this specific photograph that we're looking at, Exhibit
13 109?
14 MR. ROSENBLATT: At first, in general.
15 THE WITNESS: At first, in general --
16 MR. GUTMAN: It's asked and answered.
17 Go ahead.
18 THE WITNESS: If he has that authority, but in this
19 case, I believe that what he would do is run it by Slash
20 or Slash's representatives to see if Slash is okay with
21 it.
22 Can I ask Fernando a question --
23 MR. ROSENBLATT: No.
24 THE WITNESS: -- about an answer for you?
25 MR. ROSENBLATT: Not right now.

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1 THE WITNESS: I don't know what it is.
2 MR. GUTMAN: I don't know what it is either. I'd
3 like to understand what it is that you're showing the
4 witness. You need to describe it, explain what it is.
5 MR. ROSENBLATT: Right now, I'm holding a book
6 entitled Guns N' Roses Not in This Lifetime, ellipses,
7 with the Guns N' Roses trademark on the front.
8 MR. DEIXLER: What appears to be the Guns N' Roses
9 trademark on the front.
10 MR. ROSENBLATT: It's a hardcover book.
11 MR. DEIXLER: This is called the purport doctrine.
12 MR. BJORGUM: Maybe you should try more trademark
13 cases.
14 MR. DEIXLER: We'll get together afterwards to see
15 who's tried more cases.
16 MR. BJORGUM: Trademark cases.
17 MR. ROSENBLATT: So I only have one physical copy.
18 How do you think is the best way for everyone to examine
19 these first?
20 MR. DEIXLER: I would show it to the witness, I
21 would have it described as best you can, and then you
22 can ask him questions while it's in front of him. But
23 he's not going to answer questions unless he has the
24 document in front of him, if it's about the document.
25 MR. ROSENBLATT: Okay, so my description of this

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Page 182 1 document is a hardcover book that has photographs of 2 Guns N' Roses on the inside of it. Many of the 3 photographs inside of it are taken by Katarina Benzova. 4 Many of them involve the 2016 concerts. Concerts at the 5 Troubador, photos that -- pictures of you. Many of the 6 photos don't have any attribution on the photograph. 7 MR. GUTMAN: May I see the book? Thank you. 8 THE WITNESS: Are they picks? 9 MR. GUTMAN: It says pendant and guitar picks, 10 yeah. 11 THE WITNESS: She didn't take that. There are a 12 bunch of those. Oh, wow, what is this? It's a pop-up 13 that doesn't pop up? It needs Viagra. I don't even 14 know when that is. 15 Is this the Troubador? 16 MR. DEIXLER: That was his representation. You 17 ought not answer until he asks you questions. 18 THE WITNESS: Well, I was asking a question. 19 MR. DEIXLER: Right, but he asks the questions. 20 MR. ROSENBLATT: There are photos from the 21 Troubador in that book. 22 MR. DEIXLER: That's your representation. 23 THE WITNESS: I just wanted to know if this picture 24 is from the Troubador. 25 MR. DEIXLER: Right.	Page 183 1 That's your representation. There's no 2 evidence of that. You're just saying so. Right -- 3 MR. ROSENBLATT: No. 4 MR. DEIXLER: -- Counsel? 5 MR. ROSENBLATT: No, we're not just saying so. 6 MR. DEIXLER: You're not sworn as a witness, are 7 you? Would you like to be? 8 MR. GUTMAN: Nor competent to attest as to the -- 9 MR. BJORGUM: I've been to the Troubador. 10 MR. GUTMAN: -- basis for the -- the source of the 11 photograph. 12 MR. BJORGUM: I could say it's the Troubador. I've 13 been there many times. 14 MR. DEIXLER: That doesn't qualify you as an expert 15 on the Troubador. 16 MR. BJORGUM: No, it's not expert. It's a fact. 17 It's my perception to being there. 18 MR. DEIXLER: But you're not testifying. 19 THE WITNESS: I just meant this particular photo. 20 MR. ROSENBLATT: It appears so. 21 THE WITNESS: My point was just that I'm standing 22 there with a broken foot, that's all. 23 BY MR. ROSENBLATT: 24 Q. Do you remember that show? 25 A. Oh, yeah.
Page 184 1 Q. Was Kat at that show? 2 A. I don't know that I saw her. 3 Q. You had a working relationship with her at 4 that period of time? 5 A. Yes. 6 Q. So it wouldn't -- never mind, go ahead. 7 A. But I don't know that I physically saw her, 8 which doesn't mean anything. Kat's much kinder to me 9 than general media. 10 Q. Meaning she makes you look good, and you like 11 the way you look in the pictures that she takes? 12 A. As far as I know, I did. 13 That's not the Troubador. 14 What is this? 15 MR. ROSENBLATT: I haven't opened it yet. 16 MR. GUTMAN: Appears to be a ticket stub for 17 Troubador, some mock-ups of old ads for the band to 18 appear at the Troubador and Radio City, from the '80s. 19 THE WITNESS: Yeah. 20 MR. GUTMAN: Reprints or mock-ups. 21 THE WITNESS: There you go. 22 MR. ROSENBLATT: Thank you. 23 Q. Did you see -- 24 THE WITNESS: I think those go back in that 25 envelope.	Page 185 1 MR. ROSENBLATT: Sure, thank you. I'll get to it. 2 Q. Did you see these numbers, 14790, 1500 [sic]? 3 A. Yes. 4 MR. GUTMAN: I think you misread it, but okay. 5 MR. BJORGUM: 15000. 6 MR. ROSENBLATT: 14790 and 15000, sorry. It says 7 Copyright Black Frog Entities. Under license to Bravado 8 Merchandising. All rights reserved. 9 Q. Did you make any authorizations for this book 10 to come to be? 11 A. Directly? 12 Q. Directly or indirectly. 13 A. I don't recall how -- I don't recall the book 14 or how it came to be. But that if there were some form 15 of a promotional package put together, then yes. 16 Q. Did you profit off of this book? 17 A. I have no idea. I don't know. It could have 18 been -- it could have been complimentary. I don't know 19 what was done with that book. 20 Q. Do you know where you sold this book? 21 MR. GUTMAN: Objection. Assumes a fact. 22 THE WITNESS: I didn't know if we sold it or not. 23 I mean, when I first saw you holding it, I thought it 24 might have came in the Geffen box set. So I don't know. 25 ///

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Page 186 1 BY MR. ROSENBLATT: 2 Q. Does Geffen have authorization to print Guns 3 N' Roses photographs? 4 MR. GUTMAN: Objection. Foundation. 5 THE WITNESS: With our authorization, yes. 6 BY MR. ROSENBLATT: 7 Q. With your prior written authorization? 8 A. I believe so, but in the record industry, 9 that's not necessarily how things happen. 10 Q. Tell me what the custom and practices are in 11 the record industry. 12 MR. GUTMAN: I'm sorry, you were mumbling. 13 Can I have the question back. 14 (Last question read.) 15 MR. GUTMAN: Objection. Foundation. Speculation. 16 Assumes a fact. 17 THE WITNESS: In our contract, in our original 18 contract, the label cannot edit our material for any 19 reason whatsoever. But they edited Sweet Child O' Mine, 20 and then when you ask who did it, this is what happens 21 in the label, they go, "He did it," okay? [Points two 22 different directions] And since the record went to 23 number one and there was no big problem, they just let 24 it go, but it was a violation, and they'll do that about 25 anything. And they have deeper pockets, and what are	Page 187 1 you gonna do? And maybe it will get settled on the 2 courthouse steps. 3 BY MR. ROSENBLATT: 4 Q. Did they try to shorten the introduction to 5 Sweet Child O' Mine? 6 MR. GUTMAN: Objection. I'm gonna instruct you not 7 to answer. 8 This is so irrelevant, and it has absolutely 9 nothing to do with any of the claims in this case. 10 You're just harassing the witness and wasting time. 11 MR. ROSENBLATT: That's not true. For the record, 12 we're seeing what Axl Rose knows and contends about -- 13 MR. GUTMAN: About -- 14 MR. ROSENBLATT: -- the copyrighting industry. 15 MR. GUTMAN: -- what happened with Sweet Child O' 16 Mine in 1986? That's what you want -- you're asking the 17 witness about; right? 18 MR. ROSENBLATT: He's familiar. He's a 19 sophisticated party, and he's familiar with -- 20 MR. DEIXLER: Bring a motion. You should bring a 21 motion. He's been instructed. Bring a motion, and 22 let's go. 23 MR. ROSENBLATT: Okay, so you're instructing him 24 not to answer. 25 Q. Have you ever licensed the lyrics to Sweet
Page 188 1 Child O' Mine? 2 MR. GUTMAN: Objection -- hold on, hold on. This 3 is again, manifestly irrelevant. Not reasonably 4 calculated to lead -- 5 MR. ROSENBLATT: Let me rephrase the question. 6 Q. Have you ever licensed the lyrics to Sweet 7 Child O' Mine to Lebeis Publishing? 8 MR. GUTMAN: Again, what's the potential relevance 9 here? 10 All right, don't answer it, since he wants to 11 play games like that. There's absolutely -- this is -- 12 MR. ROSENBLATT: Are you instructing your -- 13 MR. GUTMAN: I just did, yes. 14 MR. ROSENBLATT: -- client? 15 MR. BJORGUM: Really? Because -- 16 MR. GUTMAN: I just did. 17 MR. BJORGUM: -- it's standard for discovery. We 18 know that. 19 MR. GUTMAN: You know what, it's harassing, and 20 it's privacy, what he's done with music in the catalog. 21 Give me a break. 22 BY MR. ROSENBLATT: 23 Q. Did you license the lyrics to Sweet Child O' 24 Mine for a book that was published by Lebeis Publishing? 25 MR. GUTMAN: I thought this was just the subject of	Page 189 1 the prior instruction. You asked the same exact 2 question and added a couple if extra words. 3 MR. ROSENBLATT: This could be construed as 4 coaching the witness. 5 MR. GUTMAN: You know what, don't interrupt me. 6 I'm gonna ask you for the third time, and I'll show you 7 the same courtesy. You interrupt me, and I don't get to 8 put my objection on the record. So I'll start -- 9 MR. BJORGUM: What's your objection? Is that the 10 objection? 11 MR. ROSENBLATT: What's the objection? 12 MR. BJORGUM: I didn't hear it. 13 MR. GUTMAN: Listen, pal, I don't know where you 14 came from, what you're doing in this case, but you don't 15 get a seat at the table and start talking to me that way 16 either. 17 I've instructed the witness not to answer that 18 question previously two different times. So now you 19 disrespect the witness and harass the witness by asking 20 the same question again. Why don't you act 21 professionally? 22 MR. ROSENBLATT: For the record, I asked three 23 different questions on different levels of 24 specification, and we'll let the record reflect that. 25 MR. GUTMAN: We'll see. You can take that up with

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Page 190 1 the judge. 2 MR. DEIXLER: Let's take a break here. It's been 3 an hour and five minutes. 4 MR. ROSENBLATT: Okay, let's take a break. 5 THE VIDEOGRAPHER: We're going off the record. The 6 time is 4:17. 7 (Recess.) 8 THE VIDEOGRAPHER: We're back on the record. The 9 time is 4:41. 10 MR. ROSENBLATT: Zach Rosenblatt, deposition of Axl 11 Rose. We're going through individual photographic 12 usages that are at issue in this case. And I guess 13 we'll go through it individually because there's 14 miscommunication off the record about what there was a 15 potential stipulation to. 16 MR. GUTMAN: Wait a minute, you're representing on 17 the record something that you claim happened off the 18 record that didn't happen. We offered multiple times to 19 stipulate to that the same set of facts for each of the 20 photographs that you insist upon doing it individually. 21 So anyway, ask your question. You seem to be playing 22 games. I don't know if it's by design. You're wasting 23 time. You're harassing the witness. 24 MR. ROSENBLATT: Mark this into the record. I 25 believe it's Exhibit 109.	Page 191 1 THE REPORTER: 110. 2 MR. ROSENBLATT: 110. 3 (Defendant's Exhibit 110 was marked.) 4 BY MR. ROSENBLATT: 5 Q. Do you recognize this photo? 6 A. Not particularly, no. 7 Q. Did you ever obtain specific written consent 8 from Katarina Benzova for this particular use? 9 A. I don't know that she took this photo. 10 Q. Was Katarina Benzova a photographer at the 11 Rock In Rio concert in 2022? 12 A. I believe so. 13 Q. Is it possible that Katarina Benzova took this 14 photo? 15 A. Yes. 16 Q. She's registered this photo as the author of 17 this photo. Do you dispute that? 18 MR. GUTMAN: Dispute that she registered it, or 19 dispute that she's entitled to register it? Objection. 20 Foundation. Speculation on both ambiguous -- ambiguous 21 interpretations. 22 THE WITNESS: Could I get clarification on the 23 question? 24 BY MR. ROSENBLATT: 25 Q. Sure. Do you dispute that Katarina Benzova
Page 192 1 took this picture? 2 MR. GUTMAN: Objection. Foundation. 3 THE WITNESS: I've already answered I don't know. 4 BY MR. ROSENBLATT: 5 Q. Was this sold on the Guns N' Roses website, 6 the Rock In Rio 2002 [sic] concert? 7 MR. GUTMAN: Objection. Foundation. 8 THE WITNESS: Is what sold? 9 BY MR. ROSENBLATT: 10 Q. A CD of a total running of time of 163 11 minutes. 12 A. I don't know anything about that. 13 Q. Who would know? 14 MR. GUTMAN: Objection. Foundation. 15 THE WITNESS: If we put it out, I would say 16 Fernando, possibly Geffen Records, Universal. I don't 17 know if Geffen deals with South America or Universal 18 does at this time. I don't remember. 19 BY MR. ROSENBLATT: 20 Q. Did you ever represent to Geffen that you own 21 this photograph? 22 A. Personally? 23 Q. Or any of your agents. 24 MR. GUTMAN: Well, I don't know of any other basis. 25 You can answer the question, did you --	Page 193 1 THE WITNESS: If Kat took the photo, then I feel 2 that would already be established. 3 MR. DEIXLER: It's 111. 4 MR. ROSENBLATT: I'll mark for the record 111. 5 Thank you, Counsel. 6 (Defendant's Exhibit 111 was marked.) 7 BY MR. ROSENBLATT: 8 Q. Do you recognize that photograph? 9 A. No. 10 Q. Do you believe you own that photograph? 11 A. I don't know that it's a real photograph. I 12 don't know. I'm not saying it isn't. I don't know. 13 Q. Do you think this could be a bootleg 14 photograph? 15 A. It could be AI. 16 Q. Do you think this photograph is AI? 17 A. I have no idea. I'm not joking. 18 Q. You didn't authorize this photograph to be 19 published by the New Zealand Exclusive? 20 A. Personally, no. 21 Q. Did Fernando Lebeis? Did Duff? 22 A. I don't know -- I don't know that the 23 photograph is a real photograph, but if it's a real 24 photograph and came from us in some way, then I would 25 say yes, we authorized its use, whether Duff did to

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Page 194 1 management or one of his representatives to management, 2 and then management to whomever was dealing with the 3 company you said, the New Zealand whatever. 4 Q. What's the name of Duff's manager? 5 A. Brian. 6 Q. What's his last name? 7 A. I don't recall right now. Seriously. I just 8 call him Brian. I've called him Brian for 12 years. 9 Q. Okay. And Slash has his own manager? 10 A. Yeah, and his name is Jeff. That's all I 11 know. 12 Q. Okay. So if you were to own this photograph, 13 you wouldn't approve of this photograph because it only 14 has Duff in it? 15 A. I like the photograph. I would say it's 16 great, but I would just say check with Duff to whomever 17 was asking me, "Do you want to use this photo? Is it 18 okay to use this photo?" I'd say check with Duff. So 19 that would be either his representatives or him, and 20 that could be his wife, his manager. 21 Q. Do you have the power to veto a photograph? 22 Say Duff did want the photograph and you didn't want it. 23 Do you have the power to -- 24 A. Of Duff? 25 MR. ROSENBLATT: Yeah.	Page 195 1 MR. GUTMAN: Incomplete hypothetical. 2 THE WITNESS: I would say that it's possible but 3 has not come up. 4 BY MR. ROSENBLATT: 5 Q. Okay. Is there any written agreement that 6 delineates your power with the photographs amongst Duff 7 and Slash? 8 A. In our band agreement, I am the president, and 9 there is a level of respect from them with that and with 10 our management team, as things run well, and -- but if I 11 was -- 12 You're asking me if I was against the photo? 13 Was that the question again? 14 Q. Do you have the power to... 15 MR. GUTMAN: Actually, can we get the question -- 16 THE WITNESS: It hasn't come up where I've had to 17 say no, and it hasn't come up where I've gone, "Are you 18 sure you want to use it" or I've been against it. That 19 hasn't come up over these 12 years. 20 BY MR. ROSENBLATT: 21 Q. Is Guns N' Roses a partnership? 22 A. Yes. 23 Q. And you're the president of Guns N' Roses? 24 A. Yes. 25 Q. And how is the power split amongst the
Page 196 1 partners? 2 MR. GUTMAN: Objection. Foundation. Vague and 3 ambiguous. 4 THE WITNESS: I think that can get sensitive. So 5 everyone tries to deal with each other with respect on 6 whatever issue may be up at the -- at the time. It 7 generally is myself, then Slash, then Duff, but it would 8 also depend on how what issue is affecting each 9 individual. If it was an issue about Slash, then he 10 would have -- he would just be given the more say-so on 11 it. If it was an issue just about Duff, then -- or say 12 Duff -- something done with a song Duff sang on stage, 13 then Duff would have the say-so about that. 14 BY MR. ROSENBLATT: 15 Q. So it's kind of case by case? 16 A. Yes. 17 Q. When it comes to photos of the band, it 18 depends who's in the photo? 19 A. Yes. 20 Q. Okay. And when it comes to publishing rights, 21 that's not predetermined? 22 MR. GUTMAN: Objection. Vague and ambiguous. 23 THE WITNESS: It depends on the song, you know, if 24 it's a new song that's being sorted out before the song 25 is released.	Page 197 1 MR. ROSENBLATT: Mark into Exhibit 112, this 2 photograph. 3 (Defendant's Exhibit 112 was marked.) 4 BY MR. ROSENBLATT: 5 Q. Do you recognize that person? 6 A. Yes, that's Frank. 7 Q. Who's Frank? 8 A. Frank is our former drummer for 19 years. 9 Q. Do you have the same policy with Frank as with 10 Slash and Duff over photographs? 11 A. Regarding his photos? 12 Q. Yeah. 13 A. I'm not specifically aware of that, but if 14 Frank didn't like something, you know, he would -- he 15 could tell me, but he would generally say it to Beta, 16 Vanessa, or Fernando, and we would go from there. And 17 you know, if we felt no, it's really great, we might 18 debate that with him, but generally, we just want 19 everybody to be happy with their photos, and there's no 20 reason, really, for them not to be, I mean, in a sense 21 of like they find a photo they like, that they want to 22 use, that they think represents them well. 23 Q. But you have control over whether this photo 24 would get published or not because it's affiliated with 25 Guns N' Roses?

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Page 198 1 MR. GUTMAN: Objection. Vague and ambiguous. 2 Argumentative. 3 THE WITNESS: Yes, I can, and especially if it's a 4 group shot. 5 BY MR. ROSENBLATT: 6 Q. Did you know that this photo was distributed 7 on Nightrain? 8 A. No, I didn't. 9 MR. GUTMAN: Objection. Foundation. 10 THE WITNESS: No, I didn't. 11 BY MR. ROSENBLATT: 12 Q. Is there a policy about why any of the photos 13 on Nightrain aren't attributed to Katarina Benzova? 14 A. I don't know that they are or aren't. 15 Q. But there's not a fixed policy in place? 16 A. I do not know. I don't know now, and I don't 17 know about a fixed policy -- 18 Q. Do you have the -- 19 A. -- either way. 20 Q. Oh, sorry, go ahead. 21 A. I don't know about a fixed policy either way. 22 Q. Do you have the power to attribute photo 23 credit to this photo if it's published on Nightrain? 24 MR. GUTMAN: Objection. Foundation. 25 Argumentative.	Page 199 1 THE WITNESS: I believe so. 2 BY MR. ROSENBLATT: 3 Q. There's nothing that's holding you back? 4 MR. GUTMAN: Objection. Argumentative. 5 THE WITNESS: No. 6 MR. ROSENBLATT: Exhibit 113. 7 (Defendant's Exhibit 113 was marked.) 8 BY MR. ROSENBLATT: 9 Q. Have you ever seen this photo? 10 A. No. 11 Q. Did you ever get -- and I understand I'm 12 asking the same questions. 13 Did you ever get written release from Katarina 14 Benzova for this photograph? 15 A. Not personally, no. 16 Q. Is there any reason you know of, of why she's 17 not attributed to this photograph? 18 MR. GUTMAN: Objection. Foundation. Speculation. 19 Assumes a fact. 20 THE WITNESS: No, and I have no understanding of 21 that. No awareness or understanding of that. 22 BY MR. ROSENBLATT: 23 Q. Of photo attribution? 24 A. Photo credit. Are you saying that attribution 25 is the same as photo credit?
Page 200 1 Q. Yeah, like the power to attribute photo 2 credit -- 3 A. So you mean -- 4 Q. -- onto a photo. 5 A. -- me having the power to attribute the 6 credit? 7 Q. Right, or take away, or say this won't get 8 photo credit or this will get photo credit. 9 MR. GUTMAN: So what's the question? 10 BY MR. ROSENBLATT: 11 Q. Do you have the power to decide if there is 12 photo credit or not photo credit on any particular photo 13 on Nightrain? 14 A. I don't know how we do Nightrain, but I would 15 believe so. 16 Q. Who would know? 17 MR. GUTMAN: Objection. Foundation. Speculation. 18 THE WITNESS: I would think I just have that either 19 way, but I would say Doug Mark would know, and then 20 Fernando would know. 21 BY MR. ROSENBLATT: 22 Q. So you've authorized Fernando to be in charge 23 of photo attribution on Nightrain? 24 A. I don't know who directly handles Nightrain. 25 If management is overseeing who's handling Nightrain,	Page 201 1 then I guess yes. 2 Q. Okay, so you -- I'm just trying to get this 3 clear -- delegated somebody to handle photo credit on 4 Nightrain, either directly or indirectly. 5 A. Photo credit or lack thereof, if it's deemed 6 unnecessary. 7 Q. So is there any particular reason you did not 8 give Katarina Benzova photo credit on this photo? 9 A. I don't know that that is the case, but if 10 that were the case, I would say that to us, we feel the 11 public knows that Kat Benzova is our photographer and 12 would assume that she took those photos. 13 Q. But you believe she's not allowed to exploit 14 them on her own without your approval? 15 A. Correct. 16 Q. So if Kat was to sell this photograph on her 17 own, what would your reaction be? 18 MR. GUTMAN: Foundation. Incomplete hypothetical. 19 Calls for speculation. Also calls for a legal 20 conclusion. 21 THE WITNESS: Well, that would kind of depend how I 22 learned about it, I mean, if I learned about it because 23 I saw it and I asked somebody, or I was informed of it, 24 you know. If I was -- say I was informed by Fernando, 25 Beta, or say Slash or Duff or their significant others,

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Page 202 1 "hey, what's going on," then I would inquire to Beta and 2 Fernando regarding that, and possibly Doug Mark, but 3 generally Beta and Fernando. And when I say Beta, that 4 may be Beta then contacting Fernando on my behalf. 5 BY MR. ROSENBLATT: 6 Q. And you've been informed by Beta and Fernando 7 that you are the owner of all of these photographs that 8 are at issue in this case? 9 MR. GUTMAN: Objection. Foundation. Misstates, 10 mischaracterizes prior testimony. Also presumes there 11 may have been some attorney-client communications. 12 THE WITNESS: The photos taken by Kat Benzova, yes. 13 BY MR. ROSENBLATT: 14 Q. So Fernando informed you that all of the 15 photos that Kat took of Guns N' Roses are owned by 16 either Axl Rose, Gundam, any of the agents -- any of the 17 agencies or entities that you're a part of? 18 A. Yes. Unless legally it's specifically to -- 19 considered to one group of that. But as affiliated, 20 yes. 21 Q. Did Fernando ever inform you of any photo 22 exhibition that Kat wanted to do of the photos that she 23 took of Guns N' Roses? 24 A. I recall something about that. 25 Q. When?	Page 203 1 A. Maybe a few years back. Maybe around 2017. I 2 don't have a specific date. I'm guessing. 3 Q. What was your reaction? 4 A. Nothing seemed to come out of it. So that's 5 all I know. 6 Q. Did you see any of those photographs that 7 were -- 8 A. No. 9 Q. -- potentially going to be part of that 10 exhibit? 11 A. I did not. 12 Q. They never got to you? 13 A. No. 14 MR. ROSENBLATT: Okay. Exhibit 113? 15 THE WITNESS: 114. 16 MR. ROSENBLATT: 114. 17 THE WITNESS: I would like to say something to you 18 guys in private. It's a very quick question. 19 MR. DEIXLER: Let's go outside. 20 MR. ROSENBLATT: Hold on, hold on. We're going off 21 the record? 22 MR. GUTMAN: Yeah, we need to go off the record for 23 a minute. 24 MR. ROSENBLATT: Okay. For how long? 25 MR. DEIXLER: For a minute.
Page 204 1 THE VIDEOGRAPHER: We're going off the record. The 2 time is 5:03. 3 (Recess.) 4 THE VIDEOGRAPHER: We're back on the record. The 5 time is 5:06. 6 MR. ROSENBLATT: I believe we're at Exhibit 113? 7 THE REPORTER: 114. 8 MR. ROSENBLATT: 114. 9 (Defendant's Exhibit 114 was marked.) 10 BY MR. ROSENBLATT: 11 Q. This is a picture of Slash. Do you agree? 12 A. Yes. 13 Q. This picture was taken by Katarina Benzova. 14 It has been published on Nightrain. 15 Are you aware of that? 16 A. No. 17 Q. Did you get Ms. Benzova's specific written 18 consent to publish on Nightrain this photograph? 19 A. I was not involved in that or would think that 20 we required it, or we were required to have that. 21 Q. But you believe you -- "you" as in Guns N' 22 Roses -- owns this photograph? 23 A. If Kat took it, yes. 24 Q. And you think it's likely Slash approved of 25 this photograph?	Page 205 1 A. Likely. Or one of his representatives on his 2 behalf. 3 Q. Was there a meme of you in 2016? 4 MR. GUTMAN: What's the word? Meme? 5 MR. ROSENBLATT: Meme, M-e-m-e. 6 MR. GUTMAN: Objection. Foundation. Vague and 7 ambiguous. Unintelligible. 8 BY MR. ROSENBLATT: 9 Q. Are you aware of any meme of you in 2016? 10 A. No. No idea. 11 Q. Are you aware of any unflattering photos that 12 you did not take that were circulated around 2016 or 13 2017? 14 A. That I didn't take? 15 Q. That you don't own, and circulated. 16 MR. DEIXLER: Can I have the question? 17 THE WITNESS: Not specifically, no. 18 MR. DEIXLER: I guess he's answered it. The 19 question was unintelligible. 20 MR. ROSENBLATT: Exhibit 115. 21 (Defendant's Exhibit 115 was marked.) 22 BY MR. ROSENBLATT: 23 Q. Have you ever seen that photograph? 24 A. No. 25 Q. Did you ever claim to own this photograph?

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1 MR. GUTMAN: I'm sorry, what's the question?

2 BY MR. ROSENBLATT:

3 Q. Did you ever claim to own this photograph?

4 A. I don't recall the photograph.

5 Q. So you may own this photograph?

6 A. I don't know. It looks like it could be a

7 doctored photograph.

8 Q. It's definitely edited.

9 You never submitted a Digital Millennium

10 Copyright Act in connection with this photograph?

11 A. Not personally, and not that I am aware of.

12 Q. So on March 22nd, 2017, you or any of your

13 agents didn't submit a Digital Millennium [sic]

14 Copyright Act in connection with that photograph?

15 A. I'm not aware of that.

16 Q. On April 24th, 2017, did you or any of your

17 agents submit a Digital Millennium [sic] Copyright Act

18 in connection with that photograph?

19 A. Not that I'm aware of.

20 Q. On March 23rd, 2017, did you or any of your

21 agents submit a Digital Millennium [sic] Copyright Act

22 in connection with this photograph?

23 A. Not that I know.

24 Q. On June 6th --

25 A. And I'm not aware of anything to do with this

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1 Q. Is that a picture of you?

2 A. I don't know.

3 Q. You don't recognize yourself in that picture?

4 A. No, not really. I -- no, I don't. I'm not

5 saying it is or it isn't. To me, it looks like Robert

6 John.

7 Q. Is that the photographer? That's what he

8 looks like?

9 A. Yeah.

10 Q. So you think that might be a picture of Robert

11 John?

12 A. Possibly.

13 MR. ROSENBLATT: Exhibit 116.

14 (Defendant's Exhibit 116 was marked.)

15 THE WITNESS: May I ask a question?

16 MR. DEIXLER: No, later. We don't want to

17 interrupt the momentum.

18 MR. GUTMAN: You know, I just noticed you've gotten

19 something written on several of these exhibits that are

20 not on the copies that you've presented. So I see --

21 huh. You know, that's totally inappropriate, Counsel.

22 You're supposed to show us exactly what you're

23 presenting. You've got handwritten notes on several of

24 these. So I'm going to note for the record, on 112 is

25 written "Nightrain," on 113, "Nightrain," 114,

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1 photo.

2 MR. GUTMAN: Instead of asking him all these other

3 dates, why don't you just say, "Are you aware anybody

4 ever submitted a takedown notice pursuant to the DMCA?"

5 MR. DEIXLER: He didn't even say "takedown notice."

6 It was a poorly formed question. We've been warned by

7 his brother here that we shouldn't help him.

8 MR. GUTMAN: Yeah, all right. I thought since --

9 maybe he remembers June 2nd, 2016, as opposed to April.

10 MR. DEIXLER: He'll never forget. He'll never

11 forget.

12 THE WITNESS: I don't know. To me, it looks like

13 some kind of edited stunt.

14 BY MR. ROSENBLATT:

15 Q. So you don't know who Web Sheriff is?

16 A. What's a web share?

17 Q. So Black Frog never claimed to own this

18 photograph?

19 A. I personally am not aware of anything to do

20 with this photograph. I don't recall anything.

21 Q. Is this an example of the type of photographs

22 that you don't want the public to be able to do at

23 concerts and such?

24 A. Well, I don't know what this is. I don't know

25 that that's a --

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1 "Nightrain," and 116, "Nightrain." And none of the

2 copies of those exhibits that were provided to me have

3 that handwriting on it. So, noted on the record.

4 BY MR. ROSENBLATT:

5 Q. Do you recognize this photograph?

6 A. No.

7 MR. GUTMAN: When holding up a photo, you want to

8 identify what photo it is on the record.

9 MR. ROSENBLATT: Exhibit 116.

10 MR. GUTMAN: Okay.

11 THE WITNESS: No.

12 BY MR. ROSENBLATT:

13 Q. Is that you in the photograph?

14 A. I don't know if it's me or me doctored. I've

15 never seen the photo before, so...

16 Q. So this is one of the photos that's been

17 registered.

18 MR. GUTMAN: Are you testifying?

19 THE WITNESS: By who?

20 BY MR. ROSENBLATT:

21 Q. Are you aware that this is one of the photos

22 that's been registered?

23 A. By who?

24 Q. Ms. Benzova?

25 A. No, I have no idea of that.

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Page 210 1 Q. Are you aware that this photo is currently on 2 Nightrain? 3 A. No, I'm not. 4 Q. Did you obtain a written release from 5 Ms. Benzova to redistribute this photo on Nightrain? 6 A. If that's a photo by Kat, no, I wouldn't have 7 thought that we were required -- that it would have been 8 required for us to have a written release. 9 MR. ROSENBLATT: Exhibit 117. No markings, all 10 blank. 11 MR. GUTMAN: It's almost like he wants a 12 ticker-tape parade for doing something procedurally 13 correct. 14 (Defendant's Exhibit 117 was marked.) 15 BY MR. ROSENBLATT: 16 Q. Do you own that photograph? 17 MR. GUTMAN: Was the question, "You in that 18 photograph"? 19 BY MR. ROSENBLATT: 20 Q. Do you own this photograph? 21 A. I don't know. 22 Q. Did you obtain a written release from 23 Ms. Benzova to publish this photograph on Nightrain? 24 A. I don't know who took the photo. 25 Q. Are you aware that this is one of the	Page 211 1 registered photos that's at issue in the case? 2 MR. GUTMAN: Objection. Assumes facts. No 3 foundation. 4 THE WITNESS: I've never seen the photo. 5 BY MR. ROSENBLATT: 6 Q. Have you been presented with any of the 7 photographs that are contained in the registration that 8 are at issue in this case? 9 MR. DEIXLER: Privileged. 10 MR. ROSENBLATT: It's public record. 11 MR. DEIXLER: The photographs may be, but the 12 question of what the lawyers have shown to a witness is 13 a matter of attorney-client privilege and attorney work 14 product. If you'd like to bring a motion on it, you 15 should do so. He's instructed not to answer on those 16 grounds. 17 BY MR. ROSENBLATT: 18 Q. Do you know which photos are contained in the 19 registrations that are at issue in this case? 20 MR. DEIXLER: You can answer that yes or no. 21 THE WITNESS: No. 22 BY MR. ROSENBLATT: 23 Q. Did you initiate suit not knowing what 24 photographs are contained in the registrations at issue 25 in this case?
Page 212 1 MR. DEIXLER: That invades the attorney-client 2 privilege. 3 Don't answer. Instruct the witness not to 4 answer. 5 BY MR. ROSENBLATT: 6 Q. Do you know how many photographs are contained 7 in the registrations at issue in this case? 8 A. No. 9 Q. You're under the present belief that you own 10 all of the photographs that are contained in the 11 registrations at issue in this case? 12 A. If they were taken by Kat Benzova of anything 13 to do with Guns N' Roses, yes. 14 Q. And which particular document are you basing 15 that knowledge on? 16 MR. GUTMAN: And then the 20 or 30 times he's 17 answered the same question throughout the day today? 18 Because if that's your question, then I don't think he's 19 got anything additional to add to it since he's already 20 answered it 20 or 30 times. 21 MR. ROSENBLATT: Instructing him not to answer? 22 MR. GUTMAN: Unless you can clarify why you need 23 this particular question answered separately from the 20 24 or 30 times you've already asked the same question, yes. 25 ///	Page 213 1 BY MR. ROSENBLATT: 2 Q. Have you seen the document, the contract? 3 A. Which particular document? 4 Q. Have you seen the contract that you believe 5 granted you ownership in all of the photographs that are 6 at issue in this case? 7 A. I don't recall. 8 Q. Who wrote that contract? 9 MR. GUTMAN: Objection. Foundation. 10 THE WITNESS: I can only guess that Doug Mark did. 11 BY MR. ROSENBLATT: 12 Q. Do you have the power to terminate Fernando 13 Lebeis if he engaged in sexual misconduct? 14 A. Yes. 15 Q. Do you have the power to stop the unauthorized 16 use of photographs at any time? 17 MR. GUTMAN: Objection. Foundation. Assumes a 18 fact. Incomplete hypothetical. 19 THE WITNESS: "The power" is a -- you can attempt 20 to stop something, but getting it done could be another 21 story. 22 BY MR. ROSENBLATT: 23 Q. Do you have the legal power? 24 A. I can -- 25 MR. GUTMAN: Hold on, hold on, please, sorry.

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Page 214 1 No foundation. Calls for a legal conclusion. 2 MR. DEIXLER: Can I hear the question that's 3 pending so I can -- for the record. 4 (Last question read.) 5 MR. DEIXLER: To do what? 6 BY MR. ROSENBLATT: 7 Q. Do you have the legal power to stop the 8 unauthorized use of photographs of Guns N' Roses at any 9 time? 10 MR. GUTMAN: I need to pose an objection, sorry. 11 No foundation. Calls for a legal conclusion. 12 Vague and ambiguous. Incomplete hypothetical. And 13 wildly speculative. 14 MR. ROSENBLATT: Are you instructing him not to 15 answer? 16 MR. GUTMAN: I'm sorry? 17 MR. ROSENBLATT: Are you instructing him not to 18 answer? 19 MR. GUTMAN: I didn't. 20 THE WITNESS: No. Can I ask you to clarify the 21 question for me, please? 22 MR. ROSENBLATT: Sure. Let's use this photo as an 23 example. 24 MR. DEIXLER: Which one are you pointing at? 25 MR. ROSENBLATT: <u>Exhibit 117</u>, the latest one.	Page 215 1 MR. DEIXLER: Okay. 2 MR. ROSENBLATT: Okay? 3 Q. Do you have the legal power to stop the 4 unauthorized use of that photograph at any time. 5 MR. GUTMAN: Objection. Foundation. Calls for a 6 legal conclusion. Vague and ambiguous. Incomplete 7 hypothetical. Speculation. 8 THE WITNESS: Well, one, I've never seen the photo 9 before. Two, you're saying this is a photo that Kat 10 Benzova took. So that would mean that I own the photo, 11 and in that sense, we would feel that yes, we would have 12 the power to stop any unauthorized use of it. 13 BY MR. ROSENBLATT: 14 Q. Did you ever personally tell Ms. Benzova that 15 she did not own the copyrights in any of her 16 photographs? 17 A. I don't believe so, no. 18 Q. Did you authorize Fernando to make 19 representations about copyright ownership to 20 Ms. Benzova? 21 A. Yes. 22 Q. Were you aware that Fernando was telling 23 Ms. Benzova that Guns N' Roses owned her photographs? 24 A. Yes. 25 Q. Did you know those statements were false?
Page 216 1 MR. GUTMAN: Objection. Assumes a fact. 2 Foundation. 3 THE WITNESS: Absolutely not. 4 BY MR. ROSENBLATT: 5 Q. Did you intend for Ms. Benzova to rely on 6 those statements? 7 A. On what -- 8 Q. On the statements of ownership, that you own 9 the -- that Fernando told her that you guys own the 10 photographs. 11 A. That and our contract with her, or contracts. 12 Q. So did you intend for Ms. Benzova to rely on 13 the representation that you owned the photographs? 14 MR. GUTMAN: Objection. Foundation. Assumes 15 facts. Speculation. 16 THE WITNESS: Yes. 17 BY MR. ROSENBLATT: 18 Q. Did you want her to continue creating and 19 delivering photographs while relying on the statement 20 that you own the photographs? 21 A. Yes. 22 Q. From 2016 to 2022, did Ms. Benzova ever 23 request written contracts? 24 A. I do not know. 25 Q. Who would know?	Page 217 1 MR. GUTMAN: Objection. Foundation. 2 THE WITNESS: I would say Doug Mark, Fernando 3 Lebeis, or any of their representatives. 4 BY MR. ROSENBLATT: 5 Q. Did you represent that you are the owner of 6 the photographs to control -- to have control over 7 Ms. Benzova and prevent her from asserting her own 8 rights? 9 MR. GUTMAN: Objection. Assumes a fact not in 10 evidence. Misstates, mischaracterizes prior testimony. 11 No foundation. Argumentative. 12 THE WITNESS: Could you repeat the question, 13 please. 14 BY MR. ROSENBLATT: 15 Q. Sure. Did you intend to maintain control over 16 Ms. Benzova and prevent her from asserting her rights by 17 representing that you are the owner of the photographs? 18 MR. GUTMAN: Same objections. 19 THE WITNESS: In the way that the question is 20 worded, I don't agree that she had any such rights. 21 BY MR. ROSENBLATT: 22 Q. Did you ever take any affirmative steps to 23 limit her from exploiting the photographs taken by Guns 24 N' Roses? 25 MR. DEIXLER: I'm sorry, could I hear that

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Page 218 1 question. 2 MR. ROSENBLATT: Repeat the pending question. 3 (Record read as follows: "Did you ever take 4 any affirmative steps to limit her from 5 exploiting the photographs taken [of] Guns N' 6 Roses.") 7 THE WITNESS: It's my understanding at various 8 times, and I cannot be specific, that there were efforts 9 made by Kat to use photos of Guns N' Roses unauthorized, 10 and at times, I would be made aware of it and be in 11 agreement that that should be shut down. 12 BY MR. ROSENBLATT: 13 Q. So when you say "various times," five times or 14 more? 15 A. I feel it was off and on, but it may 16 sometimes, with that off and on, be about the same photo 17 or photos from a particular show or group of shows that 18 we were dealing with. And so it was more like in a 19 group thing. So like you could hear about it one month 20 and then think it's resolved or whatever, then you hear 21 about it two months later, and then you don't hear about 22 it anymore. 23 Q. So she would want to exploit the photo, she 24 would mention it to Fernando Lebeis, who would then 25 mention it to you, and then you would shut it down?	Page 219 1 MR. GUTMAN: Objection. Compound. Also misstates, 2 mischaracterizes prior testimony. 3 THE WITNESS: It might already be in the process on 4 our side, of it being shut down or attempted to be shut 5 down, as I was made aware of it. 6 BY MR. ROSENBLATT: 7 Q. You were made aware of it on various 8 occasions, similar incidents, this kind of similar 9 incident? 10 MR. GUTMAN: Objection. Vague and ambiguous. 11 THE WITNESS: Yes. 12 BY MR. ROSENBLATT: 13 Q. So she would want to exploit the photos on her 14 own, and it would be shut down? 15 MR. GUTMAN: Objection. Argumentative. Misstates 16 and mischaracterizes. 17 THE WITNESS: It's kind of a common thing, people 18 testing their boundaries of things. 19 BY MR. ROSENBLATT: 20 Q. When you say "various," can you approximate a 21 number? 22 A. It could be a guitar player wanting to do some 23 type of self-promotion that we feel is more at the 24 band's expense rather than at the benefit of the band as 25 a whole.
Page 220 1 Q. I'm sorry. I don't mean to be rude. Would 2 you speak up? I couldn't hear you. 3 A. It could be -- and not so much now. It could 4 be a guitar player wanting to do self-promotion 5 interviews and things when there are NDAs, and the 6 interviews are believed to be more in -- not in the best 7 interest of the band Guns N' Roses and more at the 8 expense of Guns N' Roses, to promote the other 9 individual. And so we might have an issue with that. 10 Q. So you had predetermined policies in place to 11 try to control her from not exploiting the photos on her 12 own? 13 MR. GUTMAN: Objection. Argumentative. 14 Foundation. Misstates, mischaracterizes testimony. 15 Vague and ambiguous. 16 THE WITNESS: I do not know for sure. I would say 17 there were more than likely NDAs. 18 BY MR. ROSENBLATT: 19 Q. Can you tell me a specific instance when you 20 were made aware? 21 MR. DEIXLER: Aware of what? Objection. Form of 22 the question. 23 THE WITNESS: No, I cannot give a specific 24 incident. I really can't. 25 ///	Page 221 1 BY MR. ROSENBLATT: 2 Q. It was various times? 3 A. It's various times -- 4 MR. GUTMAN: Objection. Vague and ambiguous. 5 THE WITNESS: -- and I'm only recalling, say, two 6 or three times. And when I say two or three times, it 7 could all be possibly about the same issue or two issues 8 or three separate issues. I am not clear on that. 9 BY MR. ROSENBLATT: 10 Q. Were you ever made aware that she complained 11 about not having credit on social media? 12 A. I was not aware of her not having credit 13 anywhere. 14 Q. If you were aware, would you want to give her 15 credit? 16 MR. GUTMAN: Objection. Incomplete hypothetical. 17 Calls for speculation. No foundation. 18 THE WITNESS: I don't have any issue with Kat 19 having some form of credit, you know, publicly for any 20 shot she took of us. 21 BY MR. ROSENBLATT: 22 Q. But you don't believe it was her right to 23 demand to have photo credit? 24 MR. GUTMAN: I'm sorry, I couldn't hear. 25 MR. ROSENBLATT: Will you repeat the pending

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Page 222 1 question, please. 2 (Last question read.) 3 MR. GUTMAN: Objection. Foundation. And legal 4 conclusion as far as -- and relevance whatever he 5 believes the legal right to be. 6 THE WITNESS: I would have to understand the exact 7 definition of "demand" and how something was demanded 8 and in regards to what situation in particular. So 9 it's -- I would think that it was definitely something 10 open to deal with, sort out, consider, but I don't know. 11 I mean, Keith Richards says he saw Trump coming when 12 Trump put his name bigger than them over the Atlantic 13 City show I did with the Stones. So, you know, that's 14 nuts. I don't know. If Kat wanted to do something like 15 that, I probably wouldn't have been into it. But, you 16 know, I brought Kat out because I liked her photos, you 17 know, and I don't have any problem promoting the 18 individual that took the photos. 19 BY MR. ROSENBLATT: 20 Q. Did you ever think it was not in her power to 21 require photo credit to use her photographs? 22 MR. GUTMAN: Objection. Relevance. Not reasonably 23 calculated to lead to the discovery of admissible 24 evidence what his belief was. Foundation. Speculation. 25 MR. ROSENBLATT: Let me rephrase.	Page 223 1 Q. Was it your understanding that she didn't have 2 the power to require photo credit? 3 MR. GUTMAN: Objection. Foundation. 4 THE WITNESS: I don't know that that had ever been 5 technically sorted out. 6 BY MR. ROSENBLATT: 7 Q. What do you mean "technically"? 8 A. Meaning that she may have -- if she had 9 decided to request or demand, I should say, that ad, if 10 there were any talks about it or not, I'm not aware of 11 any of that. In fact, I just assumed she was credited. 12 I don't look at the photos. 13 Q. But Fernando had the power to represent that 14 she did not have -- that she didn't have the power to 15 have photo credit? 16 A. I don't know -- I don't know if she had credit 17 or not or when or where or if it varied or what. I do 18 not know. 19 Q. In a recent statement, you said "shut it 20 down." What does "shut it down" mean? 21 A. "Shut it down" in regard to what did I say? 22 Q. About Kat trying to exploit photos on her own. 23 A. Meaning that if Kat was attempting to put out, 24 say, a calendar of photos of Guns N' Roses on her own 25 and had negotiated some deal for herself with that, then
Page 224 1 we would have stepped in to block that, or maybe we like 2 it and we go from there. But what that means, I 3 wouldn't know, because it didn't happen in that sense. 4 Q. What about a newspaper? 5 A. A newspaper... Do people read those? I don't 6 know. 7 MR. DEIXLER: What about a newspaper? Could you 8 form a question that fits the facts here? 9 BY MR. ROSENBLATT: 10 Q. Have you ever shut down any editorial 11 purposes, if Kat tried to exploit the photographs for 12 editorial purposes? 13 A. Not that I'm personally aware of. I do not 14 know if that's ever happened. 15 Q. Did you ever represent that she did not have 16 the power to exploit photos for editorial purposes? 17 A. How do you mean "editorial purposes," so I 18 understand? 19 Q. Newspapers, magazines. 20 A. Just on her own, running with it? 21 Q. Yeah. 22 A. No, she doesn't have that right. 23 Q. What about for like an expressive book, for 24 like a coffee table book? 25 A. That would have to go through me.	Page 225 1 Q. Why do you believe that? 2 MR. GUTMAN: Objection. Calls for a legal 3 conclusion. Foundation. 4 THE WITNESS: Because that was the basis of the 5 relationship. 6 BY MR. ROSENBLATT: 7 Q. And you have a specific written piece of paper 8 that says that? 9 MR. GUTMAN: Is this the 40th time you're asking 10 for that same piece of paper? 11 THE WITNESS: Asking for the same piece of paper. 12 For the record, I was always for a Kat book, 13 old, new. You know, when the old lineups -- when the 14 old lineups stopped and then we got the new lineup, it's 15 always been kind of like, damn, what do we do with all 16 the old, you know. We have to see. But I've always 17 liked her work and wanted her to get some compensation 18 out of it. 19 BY MR. ROSENBLATT: 20 Q. You never objected to the quality of her work 21 personally? 22 A. Right. And when I say the compensation, that 23 would be on deciding out of what I feel would be our 24 respect and generosity to her. 25 Q. Can you explain more?

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Page 226 1 MR. GUTMAN: Wait, wait, wait. You answered the 2 question. Ask a proper question in proper form. 3 BY MR. ROSENBLATT: 4 Q. Can you explain what you mean by the last 5 response? 6 MR. GUTMAN: No, no, no, no, no. That's not a 7 proper form, because it's not going to be translated in 8 the record properly. Ask a proper question, using nouns 9 properly declined and whatever verbs you want to install 10 in your grammatical structure. 11 MR. ROSENBLATT: Can you repeat Mr. Rose's last 12 response. 13 (Last answer read.) 14 BY MR. ROSENBLATT: 15 Q. What do you mean by "generosity"? 16 A. Well, as we own the photos, I don't feel that 17 I would be necessarily technically or legally obligated 18 for Kat to profit off of the book. Yet at the same 19 time, I liked Kat, and that could be negotiated or 20 worked out or not, depending on how that went. Maybe 21 she just got angry and said, "No, I'm doing it this 22 way," and it turns into a fight. I have no idea. It's 23 something I always wanted to do. 24 Q. Do you think you disregarded the possibility 25 that you weren't the owner of any of the photographs?	Page 227 1 MR. GUTMAN: I'm sorry, I can't hear what he's 2 saying. Can you restate or read me his question. 3 (Last question read.) 4 MR. GUTMAN: Well, let me state several objections 5 to that. It's improper form. It's argumentative. 6 Assumes facts. Foundation. And vague and ambiguous. 7 THE WITNESS: No. 8 BY MR. ROSENBLATT: 9 Q. And how did you vet that you were the owner of 10 the photographs from October 2022 until present day? 11 MR. DEIXLER: Attorney-client privilege. 12 You can answer outside of anything you've 13 discussed with a lawyer or any information a lawyer has 14 given you as a result of their investigation. So set 15 aside whatever you learned from or because of lawyers. 16 If you have some independent understanding, you should 17 give it. 18 THE WITNESS: Can you repeat the question, please. 19 MR. ROSENBLATT: Repeat the pending question. 20 (Last question read.) 21 MR. GUTMAN: Also assumes a fact not in evidence 22 that he did vet. 23 THE WITNESS: If they were photographs taken by Kat 24 with us, then we owned them. 25 ///
Page 228 1 BY MR. ROSENBLATT: 2 Q. So the assumption that you're basing your 3 ownership on is that if she took the photograph of you, 4 then you own the photograph? 5 A. Yes. She wouldn't have been working with us 6 otherwise. 7 Q. Did Fernando Lebeis -- is he formally educated 8 in anything to do with copyright matters? 9 A. "Formally" in what sense? 10 Q. Did he go to school or get a certificate or 11 get a degree or get a mentorship? Did he work for a 12 record company? 13 A. He did work for Sanctuary under Merck 14 Mercuriadis, the head of Sanctuary, and he did work 15 directly under Irving Azoff and Doc McGhee and Peter 16 Katsis and Doug Goldstein, and like I said, a group of 17 three other guys that I don't remember their names. 18 Q. And are all of those managers competent in 19 photographic copyright management? 20 A. I would believe so. 21 MR. GUTMAN: Objection. Foundation. 22 Go ahead. 23 THE WITNESS: I have no idea, but I would believe 24 so. They're all -- they're all top managers in the 25 business, yes.	Page 229 1 BY MR. ROSENBLATT: 2 Q. And do you believe Fernando Lebeis has the 3 same expertise and competency when it comes to 4 photographic copyrights? 5 MR. GUTMAN: Objection. Foundation. 6 Go ahead. 7 THE WITNESS: Yes, or more so. 8 BY MR. ROSENBLATT: 9 Q. Have you ever been in any trademark 10 infringement cases? 11 MR. GUTMAN: Is the question has he ever been in a 12 trademark -- 13 BY MR. ROSENBLATT: 14 Q. Have you ever been involved in any trademark 15 infringement cases? 16 MR. GUTMAN: Objection. Irrelevant. Not 17 reasonably calculated to lead to the discovery of 18 admissible evidence. 19 Unless you can provide me with some basis for 20 asking that question. It's not even an issue in this 21 case. 22 MR. ROSENBLATT: Exhibit... 23 MR. DEIXLER: 118. 24 MR. ROSENBLATT: 118. 25 (Defendant's <u>Exhibit 118</u> was marked.)

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Page 230 1 MR. GUTMAN: It's a complaint from 2002. 2 MR. DEIXLER: It's a 24-year-old complaint. 3 THE WITNESS: I can't tell what you guys just said. 4 MR. GUTMAN: It's a complaint that was reprinted 5 from... 6 MR. DEIXLER: It's a 24-year old complaint. 7 MR. GUTMAN: Okay, you've proven me wrong about my 8 relevance objection. 9 MR. DEIXLER: How did you get proved wrong by a 10 24-year-old complaint filed by Bravado? 11 MR. GUTMAN: I stand corrected. 12 THE WITNESS: I don't know what this is 13 specifically about. So I would have to like -- 14 MR. GUTMAN: There's no -- Axl, I'm sorry to 15 interrupt. There's no question pending. 16 What's your question? 17 BY MR. ROSENBLATT: 18 Q. The question is, have you ever been involved 19 in a copyright -- or in a trademark infringement 20 lawsuit? 21 MR. GUTMAN: And I object -- 22 You can answer that question. 23 THE WITNESS: I can just say I think so. 24 BY MR. ROSENBLATT: 25 Q. Well, can you examine the document and say yes	Page 231 1 or no? 2 A. Yeah, and I -- well, I don't recognize what 3 this is. I don't know what it's about without reading 4 the whole thing. 5 Q. Okay. Can you read paragraph 2. 6 A. Okay. "Plaintiff W Axl Rose ('Axl Rose') is a 7 resident of California." 8 Q. So you don't remember being a plaintiff in a 9 trademark infringement case with Bravado? 10 A. I know I've been in lawsuits, and I live in 11 California. That's all I know. 12 Q. Has Bravado been your exclusive merchandise 13 partner since 2002? 14 A. I think so. I'm not sure. 15 Q. Is there any other company that does Guns N' 16 Roses merchandise? 17 A. There may have been somewhere in there for a 18 brief amount of time. In this business, it goes back 19 and forth sometimes between a couple of them. 20 Q. What are those? What are the names of those 21 merchandi- -- 22 A. I don't remember the other name. Brockum. 23 Q. Brockum. Can you spell that for me? 24 A. B-r-o-k-u-m [sic], I think. Or a-m. I don't 25 know.
Page 232 1 Q. Have you ever authorized Brockum to produce 2 any merchandise using any photograph taken by Katarina 3 Benzova? 4 A. I don't know when I worked with Brockum or 5 not, to be completely honest. I have no idea. So it's 6 possible, but I don't -- it depends on how long I've 7 been with Bravado here. You know, sometimes going 8 into -- I'm not supposed to talk about it. 9 Q. You're not supposed to talk about what? 10 A. Nothing. 11 Q. About your relationship with Bravado? 12 A. No. 13 MR. DEIXLER: Is there a question pending? Why 14 don't you ask a question of the witness. It's bad 15 enough that you show a 24-year old Doe complaint in the 16 Northern District of Illinois, which surely your 17 colleague would tell you was initiated by Bravado, which 18 had an obligation to try to shut down bootleggers. But 19 I mean, we're wasting a lot of time here. Why don't you 20 ask a question that pertains to the issues in this case, 21 rather than 24-year-old trademark cases against 22 bootleggers in the Northern District of Illinois. 23 MR. ROSENBLATT: Thank you for that soliloquy. 24 Q. The next question is, have you been protecting 25 your intellectual property rights for the last 25 years?	Page 233 1 MR. GUTMAN: Objection. Overbroad. Foundation. 2 Vague and ambiguous. 3 THE WITNESS: Been longer. 4 BY MR. ROSENBLATT: 5 Q. "Longer." Since when? 6 A. Attempting to since '85. 7 Q. Do you vigorously defend your intellectual 8 property to the maximum degree possible? 9 MR. GUTMAN: Objection. Argumentative. Form of 10 the question. It's vague and ambiguous. 11 BY MR. ROSENBLATT: 12 Q. Do you think intellectual property is worth 13 protecting? 14 MR. GUTMAN: Objection. Argumentative. 15 Foundation. 16 THE WITNESS: Mine is. 17 BY MR. ROSENBLATT: 18 Q. So you weren't aware that you were a plaintiff 19 in this case? 20 A. No. 21 MR. GUTMAN: I'm sorry, "you weren't aware" what? 22 BY MR. ROSENBLATT: 23 Q. That you were a plaintiff in this case? 24 MR. DEIXLER: "This case" meaning the one 25 referenced in <u>Exhibit 118</u>, or "this case" meaning the

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Page 234 1 case in which he's now giving testimony? 2 MR. ROSENBLATT: Exhibit 118. 3 THE WITNESS: I don't recall this case. And I also 4 don't recall if there's times where we went back and 5 forth from Bravado to Brockum and then back to one of 6 them. In this business, that happens regularly with 7 merch companies outbidding the other merch company for 8 the next world tour you're doing. 9 BY MR. ROSENBLATT: 10 Q. And when you say "outbid," does that mean they 11 have different terms of sharing revenue off the 12 merchandise that will be sold? 13 A. Rates and -- yes. 14 Q. Okay. What's your current rate with Bravado? 15 A. No i- -- 16 MR. GUTMAN: Objection. Instruct -- objection. 17 Foundation. Instruct the witness not to answer. 18 Privacy. And manifestly irrelevant. It's also vague 19 and ambiguous. 20 MR. ROSENBLATT: Let's take a 15-minute break. 21 THE VIDEOGRAPHER: We're going off the record. The 22 time is 5:52. 23 (Recess.) 24 THE VIDEOGRAPHER: We're back on the record. It's 25 6:12 p.m.	Page 235 1 BY MR. ROSENBLATT: 2 Q. Is Duff a managing agent at Gundam Touring? 3 MR. GUTMAN: Objection. Foundation. 4 THE WITNESS: I don't know. 5 BY MR. ROSENBLATT: 6 Q. Is Slash a managing agent at Gundam Touring? 7 MR. GUTMAN: Objection. Foundation. 8 THE WITNESS: I do not know what their actual 9 relationship to the other countries other than the Guns 10 N' Roses band partnership. 11 BY MR. ROSENBLATT: 12 Q. How do you determine who becomes a managing 13 agent at Gundam Touring, Black Frog Entities, Black Frog 14 Music, Waterhead International, Gundam Touring? 15 MR. GUTMAN: Objection. Compound and foundation. 16 THE WITNESS: Through Doug Mark and Fernando Lebeis 17 and sometimes Beta Lebeis. 18 BY MR. ROSENBLATT: 19 Q. Are you aware that Ms. Benzova worked without 20 a written contract from mid-2016 to late 2021? 21 MR. GUTMAN: Objection. Assumes a fact. Misstates 22 evidence. Foundation. Assumes -- pardon me. Yeah, 23 foundation and assumes a fact. 24 THE WITNESS: I believe I was asked this before, 25 and I don't know anything about that.
Page 236 1 BY MR. ROSENBLATT: 2 Q. So why was there no written contract with 3 Ms. Benzova during this period? 4 MR. GUTMAN: Objection. Argumentative. 5 Foundation. Assumes a fact. Harassing. 6 THE WITNESS: If I don't know that, then I don't 7 know that there was or wasn't. 8 BY MR. ROSENBLATT: 9 Q. Who would know? 10 MR. GUTMAN: Objection. Speculation. 11 THE WITNESS: I would say Doug Mark and Fernando 12 Lebeis and my counsel here. Just them. 13 BY MR. ROSENBLATT: 14 Q. So you never instructed Fernando Lebeis or 15 anyone else not to execute a contract with Ms. Benzova? 16 MR. GUTMAN: I need the question. I couldn't hear. 17 (Last question read.) 18 MR. GUTMAN: Vague and ambiguous as to time and 19 foundation. 20 But if you know, you can answer. 21 THE WITNESS: I'm sorry, can you please repeat the 22 question. 23 BY MR. ROSENBLATT: 24 Q. Sure. Did you ever instruct Fernando Lebeis 25 or anyone else not to execute a written contract with	Page 237 1 Ms. Benzova? 2 A. No. 3 Q. Were you aware that Ms. Benzova had requested 4 written contracts? 5 A. I have no knowledge of that. 6 Q. Did you have any involvement in drafting the 7 contract presented to Ms. Benzova in August 2021? 8 A. No. 9 Q. Were you aware that the August 2021 contract 10 was presented 20 days after Ms. Benzova began working? 11 A. No. 12 Q. Were you aware that it had a definite 13 duration? 14 MR. GUTMAN: Objection. Foundation. Assumes a 15 fact. 16 THE WITNESS: No. 17 BY MR. ROSENBLATT: 18 Q. Were you aware of any legal risks of not 19 having written contracts with photographers? 20 MR. GUTMAN: Objection. Foundation. Calls for a 21 legal conclusion. 22 And to the extent that you were aware -- you 23 can answer that yes or no. 24 THE WITNESS: Could you please ask the question 25 again.

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Page 238 1 MR. ROSENBLATT: Can you repeat the question, 2 please. 3 (Last question read.) 4 THE WITNESS: Well, I would think that that's 5 possible. 6 BY MR. ROSENBLATT: 7 Q. That risks come without using written 8 contracts? 9 MR. GUTMAN: I'm sorry, the question makes no 10 sense. 11 But to the extent that any information you 12 have is based upon privileged communications with 13 counsel, I would instruct you not to respond. But if 14 you can answer without referring to any -- 15 MR. ROSENBLATT: I'll repeat the question. 16 MR. GUTMAN: -- communications with -- 17 MR. ROSENBLATT: I'll repeat the question. 18 Q. Were you aware of any legal risks of not 19 having written contracts with photographers? 20 MR. GUTMAN: That's the question we already 21 answered. 22 THE WITNESS: Am I aware -- let me see if I got 23 this right. Am I aware if there were any legal risks to 24 not have a written contract with photographers? 25 MR. ROSENBLATT: Yes.	Page 239 1 THE WITNESS: There could be, yes. 2 BY MR. ROSENBLATT: 3 Q. Did you disregard those risks? 4 A. No, not that I was aware of. 5 Q. You didn't knowingly disregard those risks? 6 A. Yes. 7 Q. You entrusted other people to take care of 8 that? 9 A. Correct. 10 Q. And who did you entrust to take care of that? 11 A. Doug Mark and Fernando Lebeis. 12 Q. Were there any other photographers working 13 without written contracts from 2016 to 2021? 14 MR. GUTMAN: The question presumes -- it is an 15 incorrect presumption that she wasn't working with a 16 written contract. 17 But we'll assume the question is, do you know 18 of any photographers who were working without a written 19 contract during that time period? 20 THE WITNESS: With Guns N' Roses? 21 MR. GUTMAN: Right. 22 THE WITNESS: No, I'm not aware. I'm not saying 23 there was or wasn't. 24 BY MR. ROSENBLATT: 25 Q. Did you have a written contract with Jarmo?
Page 240 1 A. I do not know. 2 Q. Who did you entrust to have a written contract 3 if you had one with Jarmo? 4 A. Personally, I would just trust Jarmo. 5 Q. What do you mean? You don't need a written 6 contract with Jarmo? 7 MR. GUTMAN: Objection. Argumentative. Misstates 8 and mischaracterizes his response. 9 THE WITNESS: There's no one like Jarmo on the 10 planet. So Jarmo is Jarmo, and we're grateful and 11 appreciative to have him. 12 BY MR. ROSENBLATT: 13 Q. Can you -- what do you mean by that? 14 MR. GUTMAN: Objection. Irrelevant. 15 Just, his question was, did you have a written 16 contract with Jarmo? 17 THE WITNESS: I don't know. 18 BY MR. ROSENBLATT: 19 Q. Did you review the October 2022 offer to 20 Ms. Benzova for \$8,000 to assign her rights? 21 A. No. 22 MR. GUTMAN: Let me interpose an objection. 23 Foundation. Misstates what the document states. 24 BY MR. ROSENBLATT: 25 Q. Who authorized the October 2022 offer to	Page 241 1 Ms. Benzova? 2 A. I know nothing about the offer that you are 3 referring to other than what you have said. 4 Q. No one -- you were never informed of any offer 5 to Ms. Benzova? 6 A. Correct. 7 Q. Would Fernando be aware? 8 MR. GUTMAN: Objection -- 9 THE WITNESS: I believe so. 10 BY MR. ROSENBLATT: 11 Q. Why was Ms. Benzova asked to sign a statement 12 that she work continuously from 2021 to 2022? 13 MR. GUTMAN: Assumes a fact, and foundation. 14 THE WITNESS: Because that would be when we were 15 touring. And that would be for that year of touring. 16 BY MR. ROSENBLATT: 17 Q. So you're saying that she did work 18 continuously from 2021 to 2022? 19 A. I do not recall. I believe so. 20 Q. So were you on tour continuously from 2021 to 21 2022? 22 A. Tours are done in legs of -- it can be three 23 weeks, six weeks, two months, three months. I don't 24 recall how many legs there were in '21 to '22. And 25 before each leg, you start tour pre-production, and

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Page 242 1 there may or may not be photos taken during that as 2 well. 3 Q. How long were the legs, did you say? 4 A. I think anywhere from -- in general, anywhere 5 from three weeks to three months or so. 6 Q. And then you take a break? 7 A. Yes. 8 Q. How long is the break usually? 9 A. It can be -- it can be as little as two to 10 three weeks. It can be five to six weeks. Like, at the 11 most, possibly two months, depending on -- it just has 12 to do with the routing of the next leg and how it worked 13 out best, because you're competing with all the other 14 acts and soccer teams and football teams and baseball 15 teams. So you're sorting out your routing, you know. 16 And what the best routing is, is a long-term thing to 17 figure out. 18 Q. And you figured out if and how the next leg is 19 going to occur during the break? 20 A. No. You've started that anywhere from a year 21 and a half to two years before. 22 Q. It takes a lot of planning? 23 A. Yes. 24 Q. Were you aware that Ms. Benzova's fee was 25 reduced without notice on certain occasions?	Page 243 1 A. I do not know anything about that. 2 Q. Did you authorize those reductions in fee? 3 A. I do not -- 4 MR. GUTMAN: Objection. Assumes a fact. Misstates 5 the evidence. Foundation. 6 THE WITNESS: I do not recall, and I don't know if 7 anything was reduced or not, or if it was, what may have 8 been any reason for. 9 BY MR. ROSENBLATT: 10 Q. Were you ever made aware of any compensation 11 disputes regarding Ms. Benzova's fee? 12 A. I would say not specifically, no. 13 Q. Generally? 14 A. No, not to say generally. I'm saying that 15 there may have been and there may have been 16 negotiations. 17 Q. Between Ms. Benzova and... 18 A. And Fernando or Doug Mark. I don't know if 19 she dealt directly with Doug Mark or not. 20 Q. And you authorized Fernando with the power to 21 make reductions in Ms. Benzova's compensation? 22 MR. GUTMAN: Objection. Argumentative. Misstates, 23 mischaracterizes testimony. Assumes facts. 24 THE WITNESS: He would have authorization, yes, but 25 in general, with what my understanding of the reasoning
Page 244 1 for that would be. 2 MR. ROSENBLATT: Can you repeat Mr. Rose's 3 response. 4 (Last witness response read.) 5 BY MR. ROSENBLATT: 6 Q. So he has the power, but he needs to give you 7 the reason? 8 MR. GUTMAN: Objection. Argumentative. Misstates 9 testimony. 10 THE WITNESS: Based on various circumstances, there 11 could be a reasoning to change the pay. And that if it 12 were an issue, then it would be run by me to see if I 13 agreed or not. 14 BY MR. ROSENBLATT: 15 Q. And was that ever run by you? 16 A. There were things that were ran by me, but I 17 don't have specifics. It could have to do with 18 upgrading a hotel room. So then that came out of pay or 19 something. And that would usually be something that was 20 asked for, and so it was part of the negotiation. 21 Q. Approximately how many federal lawsuits have 22 you been a party to? 23 A. No idea. 24 Q. Over five? 25 A. Maybe.	Page 245 1 Q. Who made the decision to terminate 2 Ms. Benzova's relationship with the band? 3 MR. GUTMAN: With what? 4 MR. ROSENBLATT: The band Guns N' Roses. 5 THE WITNESS: Ultimately, me. 6 BY MR. ROSENBLATT: 7 Q. And when did you make that decision to end the 8 relationship with Ms. Benzova? 9 A. As I said, I don't recall when the last times 10 we were working with her, but it had to do with 11 something I believe in '22 or '23 around South America, 12 Asia, and Australian tours -- tour legs. 13 Q. What was the financial state of the band's 14 tours at the time Ms. Benzova was terminated? 15 MR. GUTMAN: Objection. Vague and ambiguous. 16 Foundation. And financial privacy. 17 Don't answer it. 18 BY MR. ROSENBLATT: 19 Q. What reasons were given for terminating 20 Ms. Benzova's relationship with the band? 21 A. Her health and state of mind and her desire to 22 be in a regular -- her desire and feeling she had a need 23 to be in a regular form of therapy in New York with her 24 desired therapist, and that we felt the photographs, her 25 photographs of the band, were suffering due to her

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Page 246 1 personal issues at the time, that we believed was also 2 chemically or hormonal induced of her own free will. 3 Q. So you personally approved the decision to end 4 Ms. Benzova's relationship with the band? 5 A. On a -- it was in a -- on a -- it was looked 6 at as temporary, you know, for whatever that leg was, 7 and hopefully that she had got herself in a better place 8 and a better focus and would be with us for the next 9 leg. So that would give her the time that we were on 10 that combination run and then the space off before the 11 next run. And so if that was anywhere like a couple of 12 months, then there's the month or so off after that. So 13 she would have that time to focus on herself, and that's 14 all it was supposed to do, was so she could focus on 15 herself. And everyone felt -- we felt that that was in 16 her best interest and it wasn't in her best interest to 17 be out with us. So we weren't even necessarily worried 18 about -- I didn't care about having photos. 19 Q. So who took photos of the band when she wasn't 20 present? 21 A. I think Jarmo took some, and I believe 22 Guilherme, Beta's nephew, took photos. 23 Q. Did you have written contracts with those new 24 photographers? 25 A. I don't believe so.	Page 247 1 Q. Do you use any of their photographs with 2 Bravado Merchandising? 3 A. I don't know. 4 Q. Were there actual budgetary concerns that led 5 to Ms. Benzova's termination? 6 A. In regards to her wanting to have the band pay 7 for flights back and forth from Asia to New York, to her 8 therapist, and Australia, and I believe the same in 9 South America. So that was a budgetary thing. And then 10 to pay for the therapy. And also, it was my 11 understanding whatever prescriptions or whatever, 12 whatever medical care. 13 Q. And Kat asked you directly to pay for her 14 therapy? 15 A. In person, me, no. 16 Q. Did she ask you personally to pay for her 17 tickets? 18 A. It's my understanding that was with Fernando 19 and possibly Beta. 20 Q. So how did -- and then they informed you? 21 A. Yes. 22 Q. Were you aware that Fernando Lebeis told 23 Ms. Benzova she would never have to worry about being 24 cut off just before terminating her? 25 A. I can believe that.
Page 248 1 Q. Were you aware? 2 MR. GUTMAN: Well, let me interpose an objection. 3 Assumes a fact. No foundation. 4 THE WITNESS: I feel that I'm aware of something to 5 that extent. 6 BY MR. ROSENBLATT: 7 Q. That she was reassured? 8 A. Yes. 9 Q. Did you authorize Fernando Lebeis to make such 10 reassurances to Ms. Benzova? 11 A. Not -- not in so much words or anything. It 12 was just this was considered part of us. Kat was 13 considered part of us, and we just wanted her to get 14 well. 15 Q. Have you limited Fernando Lebeis's authority 16 in any way? 17 A. Limited? 18 Q. Yeah, is there anything he's not authorized to 19 do on behalf of you? 20 MR. GUTMAN: Objection to the form. It's just 21 vague and ambiguous. Foundation. Speculation. 22 THE WITNESS: In what regard? 23 BY MR. ROSENBLATT: 24 Q. We're trying to figure out what the scope of 25 his authority is in representing you as an agent.	Page 249 1 MR. GUTMAN: The question is just hopelessly vague 2 and ambiguous. Is he like authorized to, what, perform 3 medical services? 4 Where do you draw the line? What's he not 5 authorized to do? 6 THE WITNESS: I'm listening to him and asking to 7 understand the question more. That's all. 8 BY MR. ROSENBLATT: 9 Q. So is he authorized to sign on your behalf? 10 A. I would say in probably many situations. 11 Q. Which situations? 12 A. Anything to do with putting the tour together 13 and authorizing, say, shipping steel to Brazil or, you 14 know, whatever things like that, to make the tour 15 happen. And various things in personal negotiations. 16 Q. Is he authorized to sublicense photos on your 17 behalf? 18 A. I would believe so, yes. 19 Q. Are you aware that Ms. Benzova's photographs 20 continue to be used after her termination? 21 MR. GUTMAN: Objection. Foundation. 22 THE WITNESS: Probably. 23 BY MR. ROSENBLATT: 24 Q. Who authorized the continued use of 25 Ms. Benzova's photographs after her termination?

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Page 250 1 MR. GUTMAN: Objection. Assumes a fact. 2 Foundation. 3 THE WITNESS: Well, that would probably be through 4 management, but with my understanding that I feel I have 5 the absolute right to do so. 6 BY MR. ROSENBLATT: 7 Q. And you granted that abso- -- the power from 8 that absolute right to Fernando Lebeis and Beta Lebeis? 9 MR. GUTMAN: I guess this is the 41st time you can 10 answer the same question today. 11 THE WITNESS: Well, if a photo was to be used on, 12 say, some other product, like a dual endorsement, I 13 don't know, diapers, then I would want say-so before I 14 agreed. That was the kind of thing that would -- it 15 would get brought to me. It wouldn't just happen. 16 BY MR. ROSENBLATT: 17 Q. So in your right of publicity was implicated 18 your approval was required? 19 MR. GUTMAN: Objection. Calls for a legal 20 conclusion. No foundation. 21 THE WITNESS: I believe so. 22 BY MR. ROSENBLATT: 23 Q. Were you aware that Ms. Benzova's photographs 24 were being used on merchandise after her termination? 25 MR. GUTMAN: Objection. Foundation. Assumes	Page 251 1 facts. 2 THE WITNESS: I would think so. 3 BY MR. ROSENBLATT: 4 Q. Do you believe so? 5 A. Yeah, I would think so. 6 Q. It's likely? 7 A. Yes. 8 Q. You don't have a reason to think that you 9 stopped using the photographs? 10 A. Correct. 11 MR. GUTMAN: Objection. Foundation. Speculation. 12 BY MR. ROSENBLATT: 13 Q. Were you aware that Ms. Benzova's photographs 14 were licensed to third parties after her termination? 15 MR. GUTMAN: Objection. Foundation. Speculation. 16 THE WITNESS: Well, isn't that the same as the last 17 question? 18 BY MR. ROSENBLATT: 19 Q. The last question was merchandise. I can 20 repeat the question if you need. 21 A. Okay, so that would be -- earlier we 22 established merchandise was third parties. 23 Q. Some, yeah. Square rectangle. 24 So were you aware Ms. Benzova's photographs 25 were being licensed to third parties after her
Page 252 1 termination? 2 A. Not specifically, no. 3 Q. But you have no reason to... 4 A. As far as I know, we haven't stopped creating 5 or selling merchandise, and if photos are required on 6 any of that merchandise, whether it be a coffee mug or a 7 calendar, we would still be using photos that we have 8 access to. 9 Q. And were you aware that Ms. Benzova's photos 10 were being sublicensed to third parties after her 11 termination? 12 MR. GUTMAN: Objection. Assumes a fact. 13 Foundation. 14 THE WITNESS: Well, as I said earlier, I'm not 15 exactly familiar with sublicensing versus licensing. So 16 I would have to understand the exact differences in 17 those two to say. 18 BY MR. ROSENBLATT: 19 Q. Is Fernando Lebeis an expert in sublicensing? 20 A. Objection. Foundation. Assumes facts. 21 THE WITNESS: I don't know. I believe that he 22 would go through Doug Mark. 23 BY MR. ROSENBLATT: 24 Q. So what did you understand about the band's 25 legal right regarding the continued use of her	Page 253 1 photographs? 2 MR. GUTMAN: To the extent that your understanding 3 of any legal right is based upon communications with 4 counsel, I instruct you not to respond. If you have 5 independent knowledge of legal rights, then I would 6 object on the basis of foundation. But you can answer. 7 THE WITNESS: I would think that I can use them in 8 perpetuity unless there's something that says I can't in 9 writing. 10 BY MR. ROSENBLATT: 11 Q. And for any reason, to an unlimited amount of 12 third parties? 13 MR. GUTMAN: Same objections. To the extent that 14 any of your knowledge is based upon communication with 15 counsel as to what your legal rights are, I'd instruct 16 you not to answer. To the extent you have some 17 independent basis for understanding of legal rights, my 18 objection would be no foundation. 19 MR. ROSENBLATT: Can you repeat the question 20 please, the pending question. 21 (Last question read.) 22 MR. GUTMAN: We also object that the question is 23 completely unintelligible, but same objections as 24 before. 25 MR. ROSENBLATT: Will you repeat the question

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Page 254 1 before that. 2 (Record read as follows: "So what did you 3 understand about the band's legal right 4 regarding the continued use of her 5 photographs?") 6 MR. ROSENBLATT: And what was Mr. Rose's response? 7 (Record read as follows: "I would think that 8 I can use them in perpetuity unless there's 9 something that says I can't in writing.") 10 MR. ROSENBLATT: And what was my next response? 11 (Record read as follows: "And for any reason, 12 to an unlimited amount of third parties?") 13 BY MR. ROSENBLATT: 14 Q. So let me rephrase the question, okay? 15 Do you believe that you have an unlimited 16 right to license and sublicense the photos that Katarina 17 Benzova took to an unlimited amount of third parties? 18 MR. GUTMAN: That's the paraphrasing of the answer 19 that he did provide -- 20 MR. ROSENBLATT: That's coaching. This is 21 coaching. 22 MR. GUTMAN: Excuse me, don't interrupt me. You 23 keep doing that. Show a little respect and act 24 professional. You've been wasting the whole day here. 25 So let me state my objection.	Page 255 1 It's repeating the same answer that the 2 witness just gave. There's no foundation for this 3 question. It's argumentative. And it's just harassing, 4 endlessly. 5 MR. ROSENBLATT: Please repeat the question. 6 (Last question read.) 7 MR. GUTMAN: Same objections. 8 THE WITNESS: Do I believe I have the unlimited 9 right to do that? Yes. 10 BY MR. ROSENBLATT: 11 Q. Were you aware that the photographer Jarmo was 12 allowed to watermark his own photographs? 13 MR. GUTMAN: This was asked and answered. 14 MR. ROSENBLATT: No, it wasn't. 15 MR. GUTMAN: It was. 16 MR. ROSENBLATT: No, it wasn't. 17 MR. GUTMAN: Answer the question. 18 THE WITNESS: I vaguely recall something about 19 Jarmo's watermarks, but I can't elaborate on that. 20 BY MR. ROSENBLATT: 21 Q. So did you authorize Jarmo to use his own 22 watermark on the photographs? 23 A. I don't believe I objected. 24 Q. Did he ask you? 25 A. I don't recall.
Page 256 1 Q. Did Fernando Lebeis have the power to 2 authorize Jarmo to place watermarks on his own 3 photographs? 4 A. Or to sort out -- yes, in order to sort out 5 not. 6 Q. And Meegan Hodges, who's that? 7 A. Slash's girlfriend. 8 Q. She's allowed to distribute her own 9 photographs of the band? 10 MR. GUTMAN: May I have the question? I couldn't 11 hear the first part. 12 (Last question read.) 13 MR. GUTMAN: Objection. Argumentative. No 14 foundation. Calls for a legal conclusion. 15 THE WITNESS: I don't involve myself with Meegan's 16 photographs. 17 BY MR. ROSENBLATT: 18 Q. Have you ever shut any of her photographs 19 down? 20 A. No, not that I'm aware of. 21 Q. Have you ever imposed any limitations on what 22 she can do with her own photographs? 23 A. I've never looked at any of them or anything. 24 Q. So when she takes a picture of Guns N' Roses, 25 do you assume that you own that picture?	Page 257 1 MR. GUTMAN: You know, this is manifestly 2 irrelevant. Not reasonably calculated to lead to the 3 discovery of admissible evidence. 4 What happened with any other photographer or 5 any of the photographs is not material to what you're 6 claiming in this case. 7 MR. ROSENBLATT: Are you instructing him not to 8 answer? 9 MR. GUTMAN: He can answer this one question. Then 10 I'm gonna instruct him, because it's manifestly 11 irrelevant. 12 THE WITNESS: Meegan is considered by myself as an 13 amateur photographer, and that for the most part, she 14 can do what she wants as far as taking them, and then 15 their use would, besides, say social media, would go -- 16 any professional use would go through Slash and 17 management, and if there was me in it or something, then 18 I would be asked. 19 BY MR. ROSENBLATT: 20 Q. So have you ever approved a photo taken by 21 Meegan Hodges? 22 A. I don't recall doing that. 23 Q. So who makes the decisions about the different 24 treatments among the photographers? 25 MR. GUTMAN: Objection. The question is vague and

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Page 258 1 ambiguous, unintelligible. 2 THE WITNESS: I would say myself, Slash, Duff, 3 Fernando, and Beta. 4 BY MR. ROSENBLATT: 5 Q. What was your understanding of why the 6 different photographers were treated differently? 7 MR. GUTMAN: Objection. Vague, ambiguous, and 8 unintelligible. It's also manifestly irrelevant, not 9 reasonably calculated to lead to the discovery of 10 admissible evidence. 11 THE WITNESS: Meegan is not hired by Guns N' Roses 12 to photograph us. She's allowed to. And primarily 13 Slash, as his girlfriend. 14 BY MR. ROSENBLATT: 15 Q. So my first question wasn't answered. So I'm 16 gonna ask you again. I think it got lost in the midst. 17 When Meegan Hodges takes a photo of the band, 18 do you assume that you own those photos? 19 MR. GUTMAN: Objection. Relevance. 20 Don't answer it. This is a waste of time. 21 It's got nothing to do with this case. 22 Move on. 23 MR. ROSENBLATT: Are you instructing him not to 24 answer? 25 MR. GUTMAN: I did. Move on. You're wasting time.	Page 259 1 MR. ROSENBLATT: I'm not. 2 MR. GUTMAN: You are. You're playing games. 3 MR. ROSENBLATT: Okay. 4 MR. GUTMAN: You're wasting time intentionally. 5 You're harassing all of us. 6 BY MR. ROSENBLATT: 7 Q. Were you aware of Ms. Benzova's objections to 8 the disparate treatment amongst the photographers? 9 A. I know nothing about that. It was never 10 voiced to me or to anyone else that I'm aware of. 11 Q. Jarmo is a professional photographer or not a 12 professional photographer? 13 MR. GUTMAN: Objection. Vague and ambiguous. 14 THE WITNESS: Jarmo may straddle the line on that 15 one. I think that there's times where he takes photos 16 and if someone in my camp, in my trusted circle, likes 17 the photos and wants to use it, that then some 18 arrangement may be made. It's not a given. It's not 19 that he's hired for it. But he's allowed to take photos 20 because of the level of trust that we have in Jarmo. 21 BY MR. ROSENBLATT: 22 Q. Do you assume when Jarmo takes a picture of 23 the band that the band owns the photos? 24 A. Jarmo's photos are not a work for hire. 25 Jarmo's photos are something that -- I'm not aware of
Page 260 1 particularly using a Jarmo photo, but they would be 2 something that would be randomly possibly used and he 3 would be compensated for. 4 Q. Are you aware that the court found that the 5 photos Katarina Benzova took are not work for hire? 6 MR. GUTMAN: Objection. Asked and answered. 7 And to the extent that you'd have any 8 information about what happened if it came from counsel, 9 I would instruct you not to respond, as privileged. 10 MR. ROSENBLATT: You're instructing him not to 11 respond to that? 12 MR. GUTMAN: If he has information independent of 13 what he learned through counsel that's responsive, he 14 can answer. 15 THE WITNESS: No, I do not have information outside 16 of counsel. 17 BY MR. ROSENBLATT: 18 Q. Who had the authority to license photographs 19 to the Petersen car museum? 20 (Mr. Bjorgum leaves deposition.) 21 MR. GUTMAN: Co-counsel stormed out. 22 MR. DEIXLER: Who could blame him? 23 THE WITNESS: Can you repeat the question, please. 24 MR. ROSENBLATT: Can you repeat the pending 25 question, please.	Page 261 1 (Last question read.) 2 THE WITNESS: I believe that would be Guns N' 3 Roses. 4 BY MR. ROSENBLATT: 5 Q. Who had the authority to license photographs 6 to Ernie Ball, Inc., for string merchandise? 7 A. I believe that would be Guns N' Roses and then 8 through Slash and/or his representatives. 9 MR. ROSENBLATT: For the record, this is a tin box 10 by Ernie Ball with a photograph of -- 11 MR. DEIXLER: Purports to be. 12 MR. ROSENBLATT: -- Slash. 13 MR. DEIXLER: You're not authenticating it. You 14 can only say what it purports to be. Somebody needs to 15 be sworn to establish what it is as a matter of 16 evidence. That's the third time I've told you how to do 17 that. 18 MR. ROSENBLATT: Do you want to look at this? 19 MR. DEIXLER: Sure. 20 MR. GUTMAN: And we're attaching this as an 21 exhibit? 22 THE WITNESS: Nice box. And? 23 BY MR. ROSENBLATT: 24 Q. Did you negotiate with Ernie Ball in 25 connection with this?

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Page 262 1 A. Me personally? 2 Q. Yes. 3 A. No. 4 Q. Do you own the photo that was used? 5 MR. GUTMAN: Foundation. 6 THE WITNESS: If that is a photo by Kat from one 7 of -- from a Guns N' Roses show, then I would say yes. 8 But if it's a photo of Kat at something Slash did 9 separately, I wouldn't know. 10 BY MR. ROSENBLATT: 11 Q. Did you obtain a written release from Kat 12 Benzova for this specific use of this photograph? 13 A. Me? No. No. 14 Q. No? 15 A. No. 16 Q. Did Slash ever bring this up to you? 17 A. No. 18 Q. Did Guns N' Roses receive any compensation for 19 this licensing arrangement? 20 A. I have no idea. 21 Q. Who would know? 22 A. I would imagine either Doug Mark, possibly 23 Bernie Gilhuly, or Slash's representatives. 24 BY MR. ROSENBLATT: 25 Q. On the social media, who made the decision to	Page 263 1 place the GNR logo on the photographs? 2 A. It's my understanding that was something that 3 Kat wanted. 4 Q. That's what Kat wanted? 5 MR. DEIXLER: He just said that. You don't need to 6 repeat it. 7 BY MR. ROSENBLATT: 8 Q. Were you aware that indicating -- strike that. 9 Were you aware that Ms. Benzova had requested 10 photo credit for her work? 11 MR. GUTMAN: That's about the 20th time you've 12 asked that same question. 13 THE WITNESS: No, I have no specifics of that. 14 BY MR. ROSENBLATT: 15 Q. Were you ever personally involved in selecting 16 any of the photographs for the Nightrain service? 17 MR. GUTMAN: That's about the 50th time you've 18 asked. 19 THE WITNESS: Not that I recall. 20 BY MR. ROSENBLATT: 21 Q. Because it never happened, or you just don't 22 remember? 23 A. I don't personally go through photos. 24 Q. How many subscribers does the Nightrain 25 service currently have?
Page 264 1 A. No idea. 2 Q. What's the subscription fee for standard 3 membership to Nightrain? 4 MR. GUTMAN: You asked that question already, and 5 we're not gonna provide any financial information. So 6 I'm gonna instruct him not to answer, even though he 7 probably doesn't even know. And I think he answered 8 that question already, he didn't know. 9 MR. DEIXLER: Correct. 10 Because you are permitted seven hours doesn't 11 mean you need to use seven hours, particularly when all 12 you are doing is repeating questions that have 13 previously been answered, often frequently. 14 MR. ROSENBLATT: I'm gonna mark for the record. I 15 think we're at... 16 THE REPORTER: 119. 17 MR. ROSENBLATT: 119. 18 (Defendant's Exhibit 119 was marked.) 19 MR. DEIXLER: This purports to be a three-page 20 document. There's only one page. 21 This purports to be a three-page document, and 22 it only has one page as presented to us. 23 MR. GUTMAN: In addition, it is marked 24 "CONFIDENTIAL SUBJECT TO A PROTECTIVE ORDER PER COURT 25 ORDER DATED APRIL 10, 2025." So to the extent that you	Page 265 1 want to use it here, I'm going to request that it not be 2 attached as an exhibit to the transcript. 3 MR. ROSENBLATT: The court order is for litigation 4 purposes only. 5 MR. DEIXLER: Isn't this a litigation? 6 MR. ROSENBLATT: That this can be used for 7 litigation purposes. 8 MR. GUTMAN: He's interpreting Judge Eick's court 9 order with the protective order. He thinks that he can 10 use it any way he wants -- 11 MR. DEIXLER: I see. 12 MR. GUTMAN: -- in the litigation. 13 MR. DEIXLER: I see. 14 MR. GUTMAN: Yeah. So he can publicly disclose it, 15 things like that. 16 THE WITNESS: Can I ask where we stand? 17 MR. GUTMAN: It's a document -- I guess he needs to 18 see if you can authenticate it, if you're familiar with 19 it. 20 BY MR. ROSENBLATT: 21 Q. Will you turn to page 2. 22 A. That's not possible for me. 23 MR. DEIXLER: You might invest in a stapler as you 24 refer your practice. 25 (Sorting out pages of the document.)

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Page 266 1 THE WITNESS: So I go to page 2? 2 BY MR. ROSENBLATT: 3 Q. At the bottom right, it should say PLAINTIFFS 4 112. 5 A. Yes. 6 Q. Is that Duff's signature? 7 A. I don't know. 8 Q. You don't know whose signature that is, who's 9 signing on behalf of Gundam Marketing? 10 A. Correct. 11 Q. Can you turn to page 1. It says PLAINTIFFS -- 12 (Videographer interruption.) 13 BY MR. ROSENBLATT: 14 Q. Turn to the first page. Can you read the 15 first sentence of paragraph 9. 16 MR. GUTMAN: Just read it to yourself. 17 Are you gonna give me the page 3 that I asked 18 for? 19 MR. ROSENBLATT: Whatever you need, Mr. Gutman. 20 MR. GUTMAN: Just the first sentence of paragraph 21 9. 22 MR. ROSENBLATT: I can read it out loud. 23 THE WITNESS: Just the first sentence? 24 BY MR. ROSENBLATT: 25 Q. Do you want me to read it out loud for you?	Page 267 1 A. Well, no, I read it. 2 Q. Okay. So what do you think it says? 3 MR. GUTMAN: Objection. That's vague and 4 ambiguous. Improper question. Argumentative. 5 Harassing. Ask him a proper question. I'm gonna 6 instruct him not to answer that one, "What do you think 7 it says?" 8 BY MR. ROSENBLATT: 9 Q. Is paragraph 9 a warranty and representation 10 that you own the photo and you're the exclusive owner of 11 the photo in connection with this agreement? 12 MR. GUTMAN: Objection. I think the old-fashioned 13 way of saying it is "document speaks for itself." And 14 it's harassing. And calls for a legal conclusion. 15 THE WITNESS: Yeah, I don't know that I can make a 16 legal conclusion, but it depends on who the photographer 17 is and what that means in regards to this particular 18 contract. 19 BY MR. ROSENBLATT: 20 Q. So let's go up to the first paragraph that 21 says Gundam Marketing LLC, parentheses, quotation mark, 22 ("Photographer"). 23 MR. GUTMAN: Is that a question? 24 MR. ROSENBLATT: I'm just clarifying. 25 Q. Do you see that?
Page 268 1 A. Yes. 2 MR. GUTMAN: Are you just harassing? 3 THE WITNESS: I do see it, yes. 4 MR. ROSENBLATT: There's no harassment. 5 MR. GUTMAN: You are harassing. 6 MR. DEIXLER: It is. It's 7 o'clock, Counsel, and 7 you're wasting everybody's time with this. 8 MR. GUTMAN: With incompetent questioning that is 9 clearly not permissible in a courtroom, which is the 10 guideline for deposition questioning. You are violating 11 the rules of civility and acting in an unprofessional 12 manner because you are not asking questions that you 13 would be allowed to ask in a courtroom. You are 14 harassing a witness after we've been here for nine hours 15 today in this stuffed room, windowless. You're 16 exhausting the court reporter. You've just proven that 17 there's really nothing, no merit, to any of the 18 allegations in the case. But beyond that, you're just 19 embarrassing yourself. 20 MR. ROSENBLATT: Are you instructing him not to 21 answer? 22 MR. GUTMAN: There was no question. 23 MR. ROSENBLATT: Please repeat the last pending 24 question. 25 MR. GUTMAN: There was no pending question.	Page 269 1 (Record read as follows: "So let's go up to 2 the first paragraph that says Gundam 3 Marketing LLC, parentheses, quotation mark, 4 ('Photographer').") 5 BY MR. ROSENBLATT: 6 Q. Are you aware that Gundam, LLC, is holding 7 themselves as the photographer in this contract? 8 MR. GUTMAN: Objection. Document speaks for 9 itself. The foundation as to what he's aware of, you're 10 asking him to look at a document for the first time that 11 he is not familiar with and asking him to opine on what 12 the document represents. That is not a proper question. 13 BY MR. ROSENBLATT: 14 Q. Mr. Rose, are you aware that you don't own 15 this picture? 16 A. I don't know anything about whatever that is. 17 I don't know if it's a drawing, an artist did a sketch, 18 some really talented three-year-old prodigy did it. I 19 don't know what it is. 20 Q. Do you believe you own that picture? 21 A. No idea what it is. 22 Q. So, is Duff authorized to sign on behalf of 23 Gundam Marketing LLC? 24 A. Well, this is something to do with Fender. 25 And in that, Duff plays a Fender bass. So this, which,

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Page 270 1 you know, my speculation is this has something to do 2 with Duff working with Fender. So it would make sense 3 for Duff to sort out what photo is used of him, if 4 that's what was required by -- if that's what Fender 5 wanted. 6 Q. And Duff is authorized to sign on behalf of 7 Gundam Marketing LLC? 8 MR. GUTMAN: Objection. Foundation. 9 THE WITNESS: In regards to his aspects of the 10 business, which if this is regarding something to do 11 with a bass endorsement or whatever with Fender, then 12 yes. 13 BY MR. ROSENBLATT: 14 Q. And did you grant him the authority to sign on 15 behalf of Gundam Marketing LLC? 16 A. Not specifically, but I would basically say in 17 general, yes. 18 MR. ROSENBLATT: Let's mark -- I think we're at 19 Exhibit 120 now. 20 (Defendant's Exhibit 120 was marked.) 21 MR. DEIXLER: Have I mentioned the power of 22 staplers before? 23 THE WITNESS: No picture? 24 MR. ROSENBLATT: No picture. 25 Q. Do you know who signed this? Who's this	Page 271 1 authorized signature? 2 A. I see no authorized signature. 3 Q. On the second page, PLAINTIFFS 123. 4 MR. GUTMAN: You gave him two first pages. 5 THE WITNESS: I have two first pages. 6 MR. DEIXLER: Have I mentioned the value of a 7 stapler? 8 THE WITNESS: I can guess that that's Slash. Or 9 "Sam." 10 BY MR. ROSENBLATT: 11 Q. And Slash has the authority to sign on behalf 12 of Gundam, LLC? 13 A. In regards to this being something to do 14 with, it looks like, his relationship with Gibson and 15 his guitars and the use of Guns N' Roses or otherwise, I 16 would say yes. 17 Q. So you warranted to Gibson that you are the 18 owner and the sole creator of all copyrights in whatever 19 work is connected with this agreement; correct? 20 MR. GUTMAN: Interpose the following objections: 21 He didn't warrant anything. You're looking at a 22 document that he's never seen before. He's not sure who 23 signed it. Signed on behalf of Gundam, LLC. I'm not 24 even sure that's the same or the correct entity that 25 we've been talking about previously here throughout the
Page 272 1 day as Gundam Touring. And I think there's a Gundam 2 Productions, Marketing. So the different entities. So 3 he didn't warrant anything. So I'll instruct him not to 4 answer your question as phrased because you're 5 argumentative and harassing. 6 BY MR. ROSENBLATT: 7 Q. Will you read the paragraph No. 1. 8 MR. GUTMAN: Read it to yourself. 9 MR. DEIXLER: Read it to yourself. 10 MR. ROSENBLATT: I'll read it out loud for the 11 record. 12 MR. DEIXLER: No, that's wasting time. 13 MR. ROSENBLATT: It's not, because he's reading to 14 himself. 15 THE WITNESS: Okay, then I'll wait till you're done 16 so I can read it for myself and see what it says. 17 MR. ROSENBLATT: Sure. "The Licensor warrants that 18 he/she is the sole creator and/or owner of all 19 copyrights in the Works, and that he/she has full power 20 to enter into this Agreement and that this Agreement 21 does not infringe the rights of any third party." 22 MR. DEIXLER: Well read. 23 MR. GUTMAN: Okay, you win the case based on your 24 reading performance skills. 25 MR. DEIXLER: At 7:07.	Page 273 1 THE WITNESS: Okay, I read it. 2 MR. GUTMAN: Is there a question? 3 THE WITNESS: I've read it. 4 BY MR. ROSENBLATT: 5 Q. Did you authorize Saul to sign on behalf of 6 Gundam, LLC? 7 A. I would assume he would be, in regards to, as 8 I said earlier, his involvement with Gibson regarding 9 Guns N' Roses and/or, more than likely, otherwise. 10 Q. Did Gundam, LLC, receive any revenue as a 11 result of this agreement? 12 A. I don't know anything about it. 13 MR. ROSENBLATT: You guys want to take one more 14 break and then one last push? 15 (Discussion regarding a break.) 16 THE VIDEOGRAPHER: We're going off the record. 17 It's 7:09. 18 (Recess.) 19 THE VIDEOGRAPHER: We're back on the record. The 20 time is 7:17. 21 MR. DEIXLER: While we were off the record, Counsel 22 was fumbling with documents, and we asked to go back on 23 the record, and the videographer refused to start the 24 process. I want that noted. Thank you. 25 MR. ROSENBLATT: Okay, we're back. We have 45

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Page 274 1 minutes left. I'd like to admit in the Exhibit 121, a 2 document from our court filing. It's document 106, page 3 56. 4 (Defendant's Exhibit 121 was marked.) 5 BY MR. ROSENBLATT: 6 Q. And if you could read the first page of 7 line 1, Mr. Rose. If you could read it out loud, I 8 would appreciate it. 9 A. Let me see what this is. I don't know what 10 this is from. 11 MR. ROSENBLATT: This is from a court filing in our 12 lawsuit. 13 MR. GUTMAN: That's your representation. 14 THE WITNESS: Yeah, that's all I see. 15 MR. ROSENBLATT: It's public information. It's 16 Document 106 in case No. 2:23-cv-08968-FMO-E. 17 THE WITNESS: Of your representation. 18 MR. ROSENBLATT: It has the official court stamp. 19 MR. GUTMAN: Counsel, ask a question. This is 20 harassment. You're showing the witness -- 21 THE WITNESS: Any document can have a court stamp. 22 MR. GUTMAN: You're showing the witness one page 23 from a joint motion for summary judgment. You want to 24 make a point? This is improper. You know it. 25 Actually, I take that back. You don't know what you're	Page 275 1 doing. But this is harassing the witness. Ask a 2 question. Learn how to conduct a deposition properly. 3 Please, you're wasting our time. What's your question? 4 BY MR. ROSENBLATT: 5 Q. Are you aware that your counsel has admitted 6 on the record that Benzova owns the copyrights at issue 7 in this case? 8 MR. GUTMAN: You can answer that yes or no. 9 THE WITNESS: No. 10 BY MR. ROSENBLATT: 11 Q. Looking at this document, are you still 12 unaware of that admission? 13 MR. GUTMAN: That's harassment. Argumentative. 14 THE WITNESS: Yes. 15 BY MR. ROSENBLATT: 16 Q. You're still unaware? 17 A. I'm still unaware of that. 18 Q. You don't believe this sentence? 19 MR. DEIXLER: Don't argue with the witness, please. 20 MR. ROSENBLATT: I'm not arguing. 21 MR. GUTMAN: You are. 22 MR. DEIXLER: Yes, you are. 23 MR. ROSENBLATT: No, you guys. 24 Q. Do you believe this to be an authentic 25 document or inauthentic document?
Page 276 1 MR. GUTMAN: How can he authenticate a document? 2 THE WITNESS: I have no idea. 3 MR. GUTMAN: You put out one page. 4 THE WITNESS: I have no idea. 5 BY MR. ROSENBLATT: 6 Q. For the record, it says, "Plaintiffs admit 7 that Benzova owns the copyrights. The issue in this 8 case is whether Plaintiffs have an implied license to 9 use," which means that you're a licensee, that you're 10 not an owner. 11 MR. GUTMAN: Okay, that's your argument. So what's 12 your question? 13 MR. ROSENBLATT: I'm just asking if Axl Rose is 14 completely unaware that this was stated on the record 15 June 9th, 2025. 16 MR. GUTMAN: He already testified that he was not 17 aware of this document. So what's your question? 18 BY MR. ROSENBLATT: 19 Q. Do you still believe that you own the 20 copyrights at issue in this case? 21 MR. GUTMAN: It's irrelevant what he still 22 believes. You're arguing with the witness. He's 23 already given you testimony. You've wasted seven hours 24 of time today. 25 THE WITNESS: Yes.	Page 277 1 BY MR. ROSENBLATT: 2 Q. You still believe? 3 A. Yes. I don't know what this is. 4 MR. ROSENBLATT: This is Exhibit... 5 THE REPORTER: 122. 6 MR. ROSENBLATT: 122. 7 (Defendant's Exhibit 122 was marked.) 8 BY MR. ROSENBLATT: 9 Q. Do you see the portion that reads, "I am out 10 of the hotel, sorry sugarbabe"? 11 A. Yes. 12 Q. Do you think it's appropriate for Fernando 13 Lebeis to call Kat Benzova "sugarbabe"? 14 A. I have no idea of the context. So I cannot 15 answer that question yes or no. 16 Q. So it may be appropriate? 17 A. Yes. 18 Q. You don't find any issue with this in and of 19 itself? 20 A. No, I do not. 21 MR. ROSENBLATT: Okay. 22 MR. DEIXLER: We're gonna assume every answer is 23 okay. So if you could cease and desist from saying that 24 and therefore commenting on the witness's testimony, I 25 would appreciate it.

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Page 278 1 MR. ROSENBLATT: Mark for the record Exhibit... 2 THE REPORTER: 123. 3 MR. ROSENBLATT: 123. 4 (Defendant's Exhibit 123 was marked.) 5 BY MR. ROSENBLATT: 6 Q. Do you see the portion in the middle of the 7 document, from Fernando Lebeis, that says, "Come give me 8 a back massage"? 9 A. Let me -- I would like to read the paragraph 10 above it, please. 11 Q. Sure. 12 A. Again, I don't know what context that was made 13 in. It could just be humor. 14 Q. So in and of itself, you find nothing 15 objectionable about this? 16 A. No. A lot of people give each other back rubs 17 on the tour. 18 Q. Okay. And a lot of time -- 19 MR. DEIXLER: We'll assume everything that he says 20 is okay. Please don't comment on the witness's 21 testimony. 22 BY MR. ROSENBLATT: 23 Q. A lot of people give each other back massages 24 on the tour? Is that what you just said? 25 A. Yes.	Page 279 1 MR. GUTMAN: That's what he just said. 2 BY MR. ROSENBLATT: 3 Q. Like who? 4 A. Well, let's see. Duff has come to Beta. 5 Maryann has given them -- one of the masseuses, Beta a 6 neck rub. I'm not sure about various crew members, but 7 people tend to care about each other's physical state at 8 the time and whatever they're going through. Or if 9 they're going through something emotionally difficult or 10 a divorce or something like that, just tension breakers. 11 Q. It's customary to get back massages from other 12 people on the crew? 13 A. I don't know about customary. It's just, it's 14 not uncommon. 15 Q. So it's pretty common that people give each 16 other back massages on the Guns N' Roses tour? 17 MR. GUTMAN: You don't have to repeat back the 18 answer he just gave in a question, confirming what he 19 just answered. 20 MR. ROSENBLATT: Can you repeat the pending 21 question. 22 (Last question read.) 23 MR. GUTMAN: Well, that was the prior answer, 24 right? 25 THE REPORTER: No, that's the question.
Page 280 1 MR. GUTMAN: Well, it's the same as the prior 2 answer. That's my point. Asked and answered. 3 BY MR. ROSENBLATT: 4 Q. And it's a known thing amongst... 5 MR. DEIXLER: Hold it, he wants to finish this 6 blockbuster. 7 "It's a known thing amongst" was where you 8 ended. Go ahead, where is the question? There must be 9 one in there. 10 BY MR. ROSENBLATT: 11 Q. It's known amongst the crew on Guns N' Roses 12 tour that it's common to give each other back massages? 13 A. You know, a lot of people on this tour are -- 14 there's a lot that are in their fifties and sixties, and 15 a lot of physical demands. And so yes, people are 16 caring about each other and their stress levels and what 17 physically they may be going through. 18 Q. And this happens like every show, people give 19 each other back massages? 20 A. I don't know, you know, but we can get on the 21 plane and somebody's neck can be hurting and ask -- and 22 might ask the person next to him, you know, "Hey, can 23 you rub on my neck for a bit?" So I don't know what 24 this was. It could just be joking, you know, that it 25 was not meant in any reality at all, you know, just	Page 281 1 playing. 2 Q. Do you think this is an appropriate joke for 3 the workplace? 4 A. It could be. 5 Q. It could be? 6 MR. DEIXLER: He just said that. Why did you 7 repeat it? You could only be doing it to harass the 8 witness. Please stop doing that. Control yourself. 9 BY MR. ROSENBLATT: 10 Q. Who was giving you a back massage? 11 MR. GUTMAN: Objection. Relevance. 12 THE WITNESS: I have three masseuses and a physical 13 trainer, and depending on what the issue is and who is 14 available, they can work on me before, after, between 15 shows, or even during a show. And there's times when 16 I've had two people working on me during a show. 17 BY MR. ROSENBLATT: 18 Q. Have you ever asked a crew member to give you 19 a back massage? 20 A. I've asked a crew member. They are part of 21 our crew. 22 Q. Besides the people that are formally 23 designated as masseuses. 24 A. No, but at this point, I'd probably consider 25 asking Opie, because he's really good at a lot of

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Page 282 1 things. 2 Q. So you've asked this person on the crew -- 3 this is the production -- the guy from the Rolling 4 Stones? 5 A. Yeah. 6 Q. You're considering it, or you have asked him? 7 A. I'm considering it now because, you know. 8 Q. You think he strong hands or... 9 A. Yeah. 10 MR. DEIXLER: Stop, that's enough. Just ask a 11 question. We're not wasting time here, anymore time. 12 MR. ROSENBLATT: Mark for the record Exhibit 1... 13 THE REPORTER: 24. 14 MR. ROSENBLATT: 124. 15 (Defendant's Exhibit 124 was marked.) 16 BY MR. ROSENBLATT: 17 Q. Can you read the first sentence from Fernando 18 sent on June 26, 2017. 19 A. "You can't use GNR and ACDC for self gain. If 20 you ever want to do anything, run it by me." 21 Q. What's your reaction to that? 22 A. That I recall things like this, of her wanting 23 to use photos that she's taken to do her own thing with, 24 without going through management or any of us or through 25 AC/DC.	Page 283 1 Q. Did you know that Fernando was going to 2 quote/unquote "shut this down"? 3 A. No, but I would -- that would be part of his 4 responsibilities. 5 Q. And you approve of that? 6 A. Absolutely. 7 Q. And he has the discretion to decide which uses 8 get shut down? 9 A. Yes. 10 MR. ROSENBLATT: Okay, thank you. 11 MR. DEIXLER: You don't have to thank him. He's 12 here to testify. 13 MR. ROSENBLATT: Exhibit 126? 14 MR. DEIXLER: 5. 15 (Defendant's Exhibit 125 was marked.) 16 BY MR. ROSENBLATT: 17 Q. Can you describe this document. 18 MR. GUTMAN: A document that he's never seen 19 before, that he's not participating in, you want him to 20 describe it? Why don't you authenticate it for the -- 21 why don't you describe what it purports to be for the 22 record. 23 MR. ROSENBLATT: This is a message from Fernando 24 Lebeis to Katarina Benzova -- 25 MR. DEIXLER: Purports to be.
Page 284 1 MR. GUTMAN: Purports to be. 2 MR. ROSENBLATT: -- on March 12th, 2020, with an 3 image of a Trojan condom box. Below it, it says, 4 "709!!!" Exclamation point, exclamation point, 5 exclamation point, "Let's watch a movie and sleep!" 6 Exclamation point. At 10:50 p.m. 7 MR. GUTMAN: Okay. And your question is? 8 BY MR. ROSENBLATT: 9 Q. What do you think "709" refers to? 10 A. A plane. I don't know. I don't know. 11 Q. Do you think it might be a hotel room number? 12 A. It's possible. 13 Q. Do you think this is an appropriate thing to 14 send to somebody on the crew? 15 A. I don't exactly know in what context, but it 16 could be something personal that would be okay, yes. 17 Q. So in and of itself, this doesn't -- it's not 18 objectionable to you? 19 A. Correct. 20 MR. ROSENBLATT: I'll mark for the record 21 Exhibit... 22 MR. DEIXLER: 126. We'll help you along. 23 MR. ROSENBLATT: 126. Thank you, Counsel. 24 (Defendant's Exhibit 126 was marked.) 25 MR. GUTMAN: Is there a question?	Page 285 1 BY MR. ROSENBLATT: 2 Q. So this is a message from -- 3 MR. DEIXLER: That purports to be. 4 BY MR. ROSENBLATT: 5 Q. -- from Fernando -- 6 MR. DEIXLER: You can't authenticate a document. 7 BY MR. ROSENBLATT: 8 Q. -- Lebeis. 9 MR. DEIXLER: You can only represent what it 10 appears to be because you don't know. You're not a 11 witness in the case. Therefore, would you please cabin 12 your question to things that are appropriate in the 13 circumstance, sir. 14 BY MR. ROSENBLATT: 15 Q. This is a document that appears to be a 16 message from Fernando Lebeis, sent on November 15th, 17 2018, to Katarina Benzova. It has an image of a wine 18 bottle and two glasses of wine. Underneath the image, 19 it says, "Come drink," at 6:10 a.m. 20 MR. GUTMAN: Okay, is there a question? 21 THE WITNESS: This says 3:40 a.m. 22 MR. ROSENBLATT: At the top left, yes. 23 MR. GUTMAN: Is there a question? 24 THE WITNESS: And then it says 6:04 on the photo, 25 okay.

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1 BY MR. ROSENBLATT:
2 Q. What's your reaction to this image?
3 MR. GUTMAN: "What's your reaction?" It's
4 completely irrelevant.
5 MR. ROSENBLATT: Don't coach the witness, please.
6 MR. GUTMAN: You know what, do not tell me what I
7 can and can't do anymore. It's so unprofessional and
8 inexperienced, it's embarrassing, and you're just
9 harassing everybody.
10 **THE WITNESS: Well, he didn't invite me. I would**
11 **have liked to try the wine. You know, it's an**
12 **invitation to come and drink wine. I don't know. I've**
13 **drank wine with a lot of people at 6:00 in the morning**
14 **and then played soccer in the hall, so...**
15 BY MR. ROSENBLATT:
16 Q. So that's customary for you?
17 **A. It can be.**
18 Q. Okay. So in and of itself, you find nothing
19 objectionable with a supervisor sending this to a crew
20 member?
21 MR. GUTMAN: Objection. Argumentative.
22 **THE WITNESS: On tour, Kat's known as "purple lips"**
23 **because she's always drinking wine. And so Kat usually**
24 **wants -- is mad that you don't want to go to the bar or**
25 **have a drink with her. So I don't know who else asked**

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1 BY MR. ROSENBLATT:
2 Q. It's not impossible?
3 MR. GUTMAN: It's argumentative, and it's just
4 harassing the witness. Obviously, you're done with your
5 questions.
6 BY MR. ROSENBLATT:
7 Q. Do you believe her photographs contributed to
8 the revenue of any of the plaintiffs or any of the
9 third-party defendants in any way, yes or no?
10 MR. GUTMAN: Objection. No foundation. Impossible
11 for this witness to form an opinion based upon your
12 speculation that photographs contributed to any revenue.
13 **THE WITNESS: I don't know specifically, no.**
14 BY MR. ROSENBLATT:
15 Q. If you had to guess yes or no?
16 MR. GUTMAN: He's not guessing. I think one of
17 your instructions in your really tedious intro was we
18 don't want you to guess or speculate. Now you're asking
19 him to guess.
20 BY MR. ROSENBLATT:
21 Q. But you believe that the photos contributed to
22 merchandising revenue?
23 MR. GUTMAN: No, that misstates and
24 mischaracterizes --
25 MR. ROSENBLATT: Is there an objection?

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1 **her to go have wine at different times or not, you know.**
2 **It's like it could be when Fernando was available to**
3 **have wine. It's not something I was aware of or --**
4 **either way.**
5 BY MR. ROSENBLATT:
6 Q. So do you think any of the photos that
7 Katarina Benzova took of Guns N' Roses contributed in
8 any way to the revenue of Guns N' Roses?
9 MR. GUTMAN: Objection. No foundation. Calls for
10 speculation. Impossible for this witness to have an
11 opinion on that.
12 **THE WITNESS: That would be speculation, I would**
13 **say, with the, maybe, exception of what merchandise it**
14 **may be used on.**
15 BY MR. ROSENBLATT:
16 Q. So you believe the photos that Katarina
17 Benzova took contributed to merchandising revenue?
18 MR. GUTMAN: Objection. Foundation. Misstates the
19 testimony. Argumentative.
20 **THE WITNESS: I said "may."**
21 BY MR. ROSENBLATT:
22 Q. "May." So it's possible?
23 MR. GUTMAN: Objection. Argumentative. Anything's
24 possible, Counsel. Incomplete hypothetical.
25 ///

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1 MR. GUTMAN: Yes, if you knew the Evidence Code,
2 you'd know that misstating, mischaracterizing testimony
3 is a proper objection. And intentionally misstating
4 what a witness said is unprofessional and unethical.
5 You apparently don't know either one of those rules.
6 MR. ROSENBLATT: Are you instructing the witness
7 not to answer?
8 MR. GUTMAN: What's your question?
9 MR. ROSENBLATT: Please repeat the pending
10 question.
11 (Last question read.)
12 MR. GUTMAN: Yeah, I'll instruct the witness,
13 because he just answered that question opposite of what
14 you just argued, you stated in your argumentative
15 question. So yes, I'm instructing.
16 MR. DEIXLER: I'm not even sure it was a question.
17 MR. GUTMAN: Yeah, it's just his argument.
18 BY MR. ROSENBLATT:
19 Q. Do you believe the photographs contributed to
20 any revenue of concert sales, or concert tickets?
21 MR. GUTMAN: Objection. Foundation.
22 **THE WITNESS: They may have.**
23 BY MR. ROSENBLATT:
24 Q. Do you believe that the photographs
25 contributed in any way to revenue derived from Nightrain

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Lisa Atlas
Lisa Atlas, CSR No. 13330

I, _____, do hereby acknowledge that I have read and examined the foregoing testimony, and the same is a true, correct and accurate transcription of the testimony given by me, and any corrections appear on the attached errata sheet signed by me.

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